

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 14..17**

Page 14	Page 16
<p>1 But if you need a break for any reason other than,</p> <p>2 you know, those regular breaks, just let me know and</p> <p>3 we'll just make sure that there's not a question</p> <p>4 pending. If there's a question out there, answer the</p> <p>5 question, and then we can take a break.</p> <p>6 Okay?</p> <p>7 A. Okay.</p> <p>8 Q. All right. So we'll go slowly so this</p> <p>9 should be -- be pretty straightforward.</p> <p>10 So, Ms. Grimes, where do you presently</p> <p>11 live? What's your residence address?</p> <p>12 A. 230 Bill Kennedy Way Southeast, Atlanta,</p> <p>13 Georgia 30316.</p> <p>14 Q. And how old are you?</p> <p>15 A. I just turned 21.</p> <p>16 Q. And what is your birthday, please?</p> <p>17 A. January 28th, 2002.</p> <p>18 Q. So you really did just turn 20 -- 21?</p> <p>19 A. Yes, ma'am.</p> <p>20 Q. Well, happy birthday.</p> <p>21 A. Thank you.</p> <p>22 Q. And where were you -- where were you</p> <p>23 born?</p> <p>24 A. In Decatur, Georgia. So DeKalb County.</p> <p>25 Q. Okay. And where did you grow up? Did</p>	<p>1 Q. Okay. How many -- how many siblings?</p> <p>2 How many brothers and sisters do you have?</p> <p>3 A. I have four brothers and one sister.</p> <p>4 Q. And where do they live now?</p> <p>5 A. Well, my older brother is dead. My</p> <p>6 little sister stays with my cousin and then two of my</p> <p>7 little brothers stay with their dad, and the</p> <p>8 youngest, he stays with his grandmother.</p> <p>9 Q. Is that all in the Atlanta area?</p> <p>10 A. No.</p> <p>11 Q. Okay.</p> <p>12 A. But it is all in Georgia, though.</p> <p>13 Q. Okay. And do you have any children?</p> <p>14 A. Yes, ma'am.</p> <p>15 Q. Okay. You have a daughter, I believe</p> <p>16 I --</p> <p>17 A. Yes, ma'am.</p> <p>18 Q. Okay. And what is her name?</p> <p>19 A. Londyn Grimes.</p> <p>20 Q. And that's L-O-N-D-Y-N?</p> <p>21 A. Yes, ma'am.</p> <p>22 Q. And how old is Londyn?</p> <p>23 A. She just turned five.</p> <p>24 Q. What is her birthday?</p> <p>25 A. February 1st.</p>
Page 15	Page 17
<p>1 you grow up in -- in DeKalb County?</p> <p>2 A. Yes. Before I moved in with my aunt, and</p> <p>3 then I grew up in Conyers, Georgia.</p> <p>4 Q. Okay. And what is your aunt's name?</p> <p>5 A. Claudette Grimes.</p> <p>6 Q. And she lives in Conyers?</p> <p>7 A. Covington now. Covington, Georgia.</p> <p>8 Q. Okay. So did you -- when you lived with</p> <p>9 her, did you live in Conyers?</p> <p>10 A. Yes, ma'am.</p> <p>11 Q. Okay. And how old were you when you</p> <p>12 moved in with your aunt?</p> <p>13 A. I was eight.</p> <p>14 Q. And before that, who did you live with?</p> <p>15 A. My mom.</p> <p>16 Q. Okay. And what's your mom's name?</p> <p>17 A. Lashanda Spencer.</p> <p>18 Q. Okay. When -- would you spell her first</p> <p>19 name, please?</p> <p>20 A. L-A-S-H-A-N-D-A, Spencer, S-P-E-N-C-E-R.</p> <p>21 Q. Okay. Great.</p> <p>22 And did you live with anyone else when</p> <p>23 you were living with your mom?</p> <p>24 A. Yeah. Like, cousins and I had other</p> <p>25 siblings as well.</p>	<p>1 Q. So she literally just turned five?</p> <p>2 A. She just turned five too, yes.</p> <p>3 Q. Okay. Well, happy birthday to her too.</p> <p>4 A. Thank you.</p> <p>5 Q. And so she was -- what year was she born?</p> <p>6 A. 2018.</p> <p>7 Q. 2018.</p> <p>8 Okay. And so how old were you when you</p> <p>9 had Londyn?</p> <p>10 A. I had just turned 16.</p> <p>11 Q. And who is Londyn's father? His -- her</p> <p>12 biological father?</p> <p>13 A. Like his name?</p> <p>14 Q. Yes.</p> <p>15 A. Ibrahim Mahdi.</p> <p>16 Q. What's the last name?</p> <p>17 A. Mahdi, M-A-H-D-I.</p> <p>18 Q. Okay. Is Mr. Mahdi someone you were in a</p> <p>19 relationship with when you -- when you conceived</p> <p>20 Londyn?</p> <p>21 A. Yes, ma'am.</p> <p>22 Q. Okay.</p> <p>23 A. Yes, ma'am.</p> <p>24 Q. Okay. All right. And does Londyn</p> <p>25 currently live with you?</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 18..21**

Page 18	Page 20
<p>1 A. No. She currently stays with my aunt.</p> <p>2 Q. Okay. So, Ms. Grimes, in the lawsuit</p> <p>3 that brings us here today, you have -- I'm going to</p> <p>4 call my client United Inn.</p> <p>5 Okay?</p> <p>6 You have sued United Inn concerning</p> <p>7 allegations that you were trafficked for sex at</p> <p>8 United Inn; is that correct?</p> <p>9 A. Correct.</p> <p>10 Q. Okay. And just to confirm what I -- what</p> <p>11 I think is the case, your lawsuit involving Stone</p> <p>12 Mountain Inn & Suites, did you, in that lawsuit,</p> <p>13 contend that you were trafficked for sex at Stone</p> <p>14 Mountain Inn & Suites?</p> <p>15 A. Yes, ma'am.</p> <p>16 Q. Okay. Is there anyplace else, other than</p> <p>17 United Inn and Stone Mountain Inn, where you have</p> <p>18 been trafficked for sex?</p> <p>19 A. No, ma'am. I mean, it was another hotel,</p> <p>20 but I can't think of the name of the hotel because it</p> <p>21 was a day -- it was like one day.</p> <p>22 Q. One day?</p> <p>23 A. Yes, ma'am.</p> <p>24 Q. Any others?</p> <p>25 A. No, ma'am.</p>	<p>1 A. Yes, ma'am.</p> <p>2 Q. All right. Can you tell me when is the</p> <p>3 first time you were traffic- -- trafficked at United</p> <p>4 Inn?</p> <p>5 A. An exact date?</p> <p>6 Q. If you know it.</p> <p>7 A. It was like October 7th or the 8th.</p> <p>8 Q. Of what year?</p> <p>9 A. 2018.</p> <p>10 Q. Had you been trafficked anywhere before</p> <p>11 you were trafficked at United Inn?</p> <p>12 A. The Stone Mountain Inn.</p> <p>13 Q. Okay. So where -- let me back up, then.</p> <p>14 Where is the first place you were -- you</p> <p>15 were trafficked?</p> <p>16 A. The Stone Mountain Inn.</p> <p>17 Q. Okay. And when was that?</p> <p>18 A. 2018 as well.</p> <p>19 Q. Okay. Do you know approximately a date</p> <p>20 or a month?</p> <p>21 A. Like a couple of months beforehand,</p> <p>22 like -- but I'm not sure of the exact.</p> <p>23 Q. A couple months before the October of</p> <p>24 2018?</p> <p>25 A. Yes. Really maybe like the month before</p>
Page 19	Page 21
<p>1 Q. Okay. The one other hotel that you --</p> <p>2 you are saying you can't remember the name of it; is</p> <p>3 that right?</p> <p>4 A. Yes, ma'am.</p> <p>5 Q. Okay. Do you know where that hotel is</p> <p>6 located?</p> <p>7 A. Yes, ma'am. It was on Memorial Drive as</p> <p>8 well.</p> <p>9 Q. Okay. If you drove by it, would you</p> <p>10 recognize it?</p> <p>11 A. Yes, ma'am.</p> <p>12 Q. Okay. Do you know how far it is from the</p> <p>13 United Inn?</p> <p>14 A. It's on the same strip. It's just --</p> <p>15 sorry.</p> <p>16 Q. That's okay.</p> <p>17 A. It's on the same strip. It's just like</p> <p>18 further up, like, the street, if that makes sense.</p> <p>19 Q. Okay. Is it on the same side of the</p> <p>20 street?</p> <p>21 A. Yes, ma'am.</p> <p>22 Q. Okay. Now, Ms. Grimes, I want to ask you</p> <p>23 about how it came to be that you were trafficked at</p> <p>24 the United Inn.</p> <p>25 Okay?</p>	<p>1 actually so --</p> <p>2 Q. Okay.</p> <p>3 A. -- August. July, August, September,</p> <p>4 October.</p> <p>5 Q. Okay.</p> <p>6 A. Yeah, the month before.</p> <p>7 THE REPORTER: The month before you</p> <p>8 said?</p> <p>9 THE WITNESS: Yes, sir.</p> <p>10 THE REPORTER: Okay. Thank you.</p> <p>11 MS. RICHENS: Yeah, speak up just --</p> <p>12 THE WITNESS: Can you not hear me?</p> <p>13 MS. RICHENS: No, he -- I can't hear</p> <p>14 you very well -- I mean, I can hear you</p> <p>15 okay because I am sitting pretty close to</p> <p>16 you, but he's -- he's probably having more</p> <p>17 trouble hearing you.</p> <p>18 So if you don't mind speaking up and</p> <p>19 he's not -- he's not picking up the</p> <p>20 microphone. That's just for the record.</p> <p>21 So...</p> <p>22 THE WITNESS: Okay.</p> <p>23 BY MS. RICHENS:</p> <p>24 Q. All right. So in the -- all right.</p> <p>25 So Stone Mountain Inn is the first place</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 26..29**

Page 26	Page 28
<p>1 A. Correct.</p> <p>2 Q. Then in October, you were trafficked by</p> <p>3 Shaq at the United Inn; correct?</p> <p>4 A. Well, no, it wasn't --</p> <p>5 Q. So is that right, or did I --</p> <p>6 A. No. I wasn't trafficked by Shaq at the</p> <p>7 United Inn. It was two other men. But my first time</p> <p>8 going to the United Inn, it was through somebody I</p> <p>9 met through Shaq. That's how I ended up there.</p> <p>10 Q. Okay.</p> <p>11 A. And we were working for Shaq, but he</p> <p>12 wasn't my actual trafficker at the United Inn.</p> <p>13 Q. Okay. When you say you -- you were</p> <p>14 working for Shaq, what does that mean?</p> <p>15 A. Making money for him.</p> <p>16 Q. Okay. But -- so I thought you -- I</p> <p>17 thought I just heard you say when you got -- when you</p> <p>18 first went to the United Inn, you were working for</p> <p>19 Shaq, but you weren't being trafficked by him; is</p> <p>20 that right?</p> <p>21 Is that what you said?</p> <p>22 A. No, that's not what I said.</p> <p>23 Q. Okay. I'm sorry.</p> <p>24 A. I said -- I said Shaq wasn't my two</p> <p>25 traffickers, because you're trying to say, like, Shaq</p>	<p>1 Q. Okay. Now, what are the names of the two</p> <p>2 men that you said you were trafficked by at United</p> <p>3 Inn?</p> <p>4 A. Cash and King.</p> <p>5 Q. Cash?</p> <p>6 A. Uh-huh.</p> <p>7 Q. C-A-S-H.</p> <p>8 And King --</p> <p>9 A. Uh-huh.</p> <p>10 Q. -- K-I-N-G?</p> <p>11 A. K-I-N-G.</p> <p>12 Q. Okay. Okay. You don't know their real</p> <p>13 names, or do you?</p> <p>14 A. One of their names is in the police</p> <p>15 report as well, but I can't think of it by heart.</p> <p>16 And the other one, I just never got his real name.</p> <p>17 Q. Okay. Which one -- if you know, which</p> <p>18 one's real name is in the police report?</p> <p>19 A. Cash.</p> <p>20 Q. Okay. All right.</p> <p>21 And -- and so you met Cash and King</p> <p>22 though Kevy?</p> <p>23 A. No. So I met them around the -- at the</p> <p>24 hotel. So Kevy -- the same day that Kevy had took me</p> <p>25 to the hotel, she had ended up leaving for something.</p>
Page 27	Page 29
<p>1 was my trafficker at the United Inn.</p> <p>2 Q. Okay.</p> <p>3 A. He wasn't. It was two other men.</p> <p>4 Q. Okay.</p> <p>5 A. But my first time going, it was to make</p> <p>6 money for Shaq, but Shaq wasn't with us at the time.</p> <p>7 Shaq had just got locked up.</p> <p>8 Q. Okay.</p> <p>9 A. That's why this girl had came on his</p> <p>10 behalf.</p> <p>11 Q. Okay.</p> <p>12 A. But he wasn't present, you -- if that</p> <p>13 makes sense, because he was locked up.</p> <p>14 Q. It does make sense. It does make sense.</p> <p>15 A. So...</p> <p>16 Q. Thank you.</p> <p>17 A. Yes, ma'am.</p> <p>18 Q. Okay. Now, so was it -- was it Kevy who</p> <p>19 took you to the United Inn?</p> <p>20 A. Yes, ma'am.</p> <p>21 Q. Okay. You didn't choose the United Inn?</p> <p>22 A. No, ma'am.</p> <p>23 Q. Okay. Were you ever at the United Inn</p> <p>24 for anything other than trafficking?</p> <p>25 A. No, ma'am.</p>	<p>1 Something had happened, and she left, and she didn't</p> <p>2 come back, and I was still at the room. They left me</p> <p>3 at the room.</p> <p>4 So the next day, the following day,</p> <p>5 they're -- you know, like, it's time to check out the</p> <p>6 room. I didn't have nowhere to go at the time, so</p> <p>7 I'm trying to get in contact with the girl who</p> <p>8 dropped me off, and I had ended up meeting King.</p> <p>9 That's when I had met King at the hotel.</p> <p>10 Q. So you met Cash and King at the hotel?</p> <p>11 A. Correct.</p> <p>12 Q. And you went to the hotel to be sex</p> <p>13 trafficked; is that --</p> <p>14 A. No.</p> <p>15 Q. Okay. Why did you go to the hotel?</p> <p>16 A. Because Kevy said Shaq wanted us to go to</p> <p>17 the hotel, so I am listening to what they're saying.</p> <p>18 Q. Okay. But did you understand that's why</p> <p>19 you would be going there?</p> <p>20 A. Yeah, to work for Shaq. I knew we were</p> <p>21 about to make money for Shaq, yes, ma'am.</p> <p>22 Q. Okay. Okay. So tell me about the</p> <p>23 first -- this first visit to the United Inn, you said</p> <p>24 it was October 7th or 8th; right?</p> <p>25 A. Correct.</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 30..33**

Page 30	Page 32
<p>1 Q. How -- how long were you there?</p> <p>2 A. For like five weeks.</p> <p>3 Q. Five weeks?</p> <p>4 A. Yes, ma'am.</p> <p>5 Q. Okay. Starting October 7th or 8th?</p> <p>6 A. Correct.</p> <p>7 Q. During those five weeks, did you ever</p> <p>8 leave the property?</p> <p>9 A. As in like live somewhere else, or just</p> <p>10 like leave to go do something or something?</p> <p>11 Q. Okay. That's a great question.</p> <p>12 During those five weeks, did you ever</p> <p>13 leave for any purpose other than just to run an</p> <p>14 errand or something like that?</p> <p>15 A. Yeah. Like, to go get food or go to</p> <p>16 the -- it was like a gas station right across the</p> <p>17 street, just, like, stuff like that, yes.</p> <p>18 Q. During those five weeks, did you ever</p> <p>19 spend the night somewhere else?</p> <p>20 A. No, I didn't.</p> <p>21 Q. Okay. And during those five weeks,</p> <p>22 Ms. Grimes, were you -- were you -- you were being</p> <p>23 trafficked at the United Inn?</p> <p>24 A. Yes, ma'am.</p> <p>25 Q. And during those five weeks, were you in</p>	<p>1 A. No, I actually don't. I never seen King</p> <p>2 rent, like, the room. He already -- when I met him,</p> <p>3 he already had his rooms so he never, like, went to</p> <p>4 rent another room. He was just already paying for</p> <p>5 the rooms that he was having.</p> <p>6 And then with Cash, I personally went</p> <p>7 with Cash to go rent rooms, but I'm not sure if they</p> <p>8 were in his name. But he was the one renting them,</p> <p>9 yes.</p> <p>10 Q. When you -- when you arrived at the</p> <p>11 United Inn, Ms. Grimes, did you understand that you</p> <p>12 were -- that -- did you have any idea you were going</p> <p>13 to be there for weeks at a time being sex trafficked?</p> <p>14 A. No, I didn't.</p> <p>15 Q. Okay. What -- what was your</p> <p>16 understanding of what you were going to be doing</p> <p>17 there?</p> <p>18 A. Making money for Shaq.</p> <p>19 Q. What do you mean by that?</p> <p>20 A. What do you mean what do I mean?</p> <p>21 Q. Having sex for money, but the money would</p> <p>22 be going to Shaq?</p> <p>23 A. Yeah, basically. I guess, like, we --</p> <p>24 Shaq said make the money so that's what we went to go</p> <p>25 do.</p>
Page 31	Page 33
<p>1 the same room the whole time?</p> <p>2 A. No, ma'am.</p> <p>3 Q. Okay.</p> <p>4 A. It was different rooms.</p> <p>5 Q. Okay. During that five-week period, do</p> <p>6 you know how many different rooms you were in?</p> <p>7 A. I would say about five different rooms as</p> <p>8 well.</p> <p>9 Q. Okay. And do you know why you moved from</p> <p>10 room to room?</p> <p>11 A. No. When I was with King, he had a set</p> <p>12 room. Like, that was the room, but he also had an</p> <p>13 extra room to work out of too. So King had two rooms</p> <p>14 and then -- well, really King -- well -- it bothered</p> <p>15 me -- King had two rooms.</p> <p>16 And then Cash -- like if -- they'll check</p> <p>17 out because sometimes they did use to check out and</p> <p>18 then, like, pay for another room because they didn't</p> <p>19 want the room, so it will be like that. Like, we're</p> <p>20 switching rooms because they didn't want the room,</p> <p>21 like...</p> <p>22 Q. Okay. Do you know -- you have referenced</p> <p>23 a little bit, but do you know who -- whose names the</p> <p>24 rooms were reserved in that you -- where you were</p> <p>25 trafficked?</p>	<p>1 Q. And that's what that means?</p> <p>2 A. Is what what?</p> <p>3 Q. Yeah, I am not trying to confuse you. I</p> <p>4 have just -- you -- you have used this term "make</p> <p>5 money" for Shaq several times.</p> <p>6 A. Like, working, yes, ma'am.</p> <p>7 Q. Like, having sex for money, or do you</p> <p>8 mean something else?</p> <p>9 A. I mean -- yes, ma'am.</p> <p>10 Q. Okay. Okay. And I'm not trying to -- if</p> <p>11 you don't understand my question or anything, I am</p> <p>12 not trying to put words in your mouth; I am just --</p> <p>13 and I hope you understand that. I'm just trying to</p> <p>14 make sure I understand what you're talking about.</p> <p>15 Okay?</p> <p>16 A. Right.</p> <p>17 Q. Okay. All right. So we talked about</p> <p>18 this five-week period when you were at the United</p> <p>19 Inn.</p> <p>20 When -- so you would have -- when you</p> <p>21 left the United Inn, then it would have been sometime</p> <p>22 in November of 2018, if we count about five weeks.</p> <p>23 A. (Witness indicating.)</p> <p>24 Q. Is that about right?</p> <p>25 A. Yes, ma'am. Oh, no, I'm -- yes, ma'am --</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 34..37**

Page 34	Page 36
<p>1 no, it was November of 2018, like, middle/end of</p> <p>2 November.</p> <p>3 Q. Okay. All right. And what happened that</p> <p>4 caused you to leave?</p> <p>5 A. Cash had got arrested.</p> <p>6 Q. Okay. And so you -- you just left the</p> <p>7 hotel?</p> <p>8 A. So since we didn't get arrested, but we</p> <p>9 were all in the room, by law they had to serve us,</p> <p>10 like, the trespassing paper. So after we signed the</p> <p>11 paper, we had left.</p> <p>12 Q. All right. And where did you -- where</p> <p>13 did you go after that?</p> <p>14 A. I really don't remember exactly. It was</p> <p>15 on Memorial Drive, though. It was where Cash had</p> <p>16 told us to go. Like, he had -- he already knew he</p> <p>17 was about to get locked up so -- and he told us,</p> <p>18 like, where to go, like, once he got locked up.</p> <p>19 So...</p> <p>20 Q. And was this -- was this that third hotel</p> <p>21 we talked about before, or is it another place?</p> <p>22 A. It's the third hotel, and he sent us to</p> <p>23 somebody so we went to go, like, stay with them for</p> <p>24 that night.</p> <p>25 Q. Were you trafficked at that other place</p>	<p>1 A. We had got a ride to United -- this boy</p> <p>2 named Kimani had took us, and he -- he got us --</p> <p>3 Q. I'm sorry. He took you; is that what you</p> <p>4 said?</p> <p>5 A. Yes, ma'am.</p> <p>6 Q. Okay.</p> <p>7 A. I was with someone else. It was me and</p> <p>8 some other girls. This boy Kimani had took us to the</p> <p>9 United Inn and got us a room at the United Inn. And</p> <p>10 we were there -- I wasn't there that long. It's -- I</p> <p>11 was the first time. We were there for like three</p> <p>12 days, maybe even less. Maybe -- well, like, yeah,</p> <p>13 like, two or three days.</p> <p>14 Q. Two to three days.</p> <p>15 Okay. And who were you -- who were</p> <p>16 you -- who were you working for during those two to</p> <p>17 three days?</p> <p>18 A. King.</p> <p>19 Q. King.</p> <p>20 And during the first day, you were -- in</p> <p>21 October/November, you were working for Cash and King</p> <p>22 or just --</p> <p>23 A. No, I'm sorry. Could you repeat it? The</p> <p>24 first --</p> <p>25 Q. Sure. So -- sure.</p>
Page 35	Page 37
<p>1 that you're talking about?</p> <p>2 A. Yes, ma'am. I mean, you can say that.</p> <p>3 It was for a night, but you could -- yes, ma'am.</p> <p>4 Q. Okay. And again, this is the third hotel</p> <p>5 that's also on Memorial Drive that we talked about</p> <p>6 before?</p> <p>7 A. Correct.</p> <p>8 Q. Okay. And you were only there for a</p> <p>9 night?</p> <p>10 A. Yes, ma'am.</p> <p>11 Q. Okay. Who -- who was with you at that</p> <p>12 hotel?</p> <p>13 A. Cash's girl. It was kind of like his</p> <p>14 girlfriend, I guess you could say. But she was</p> <p>15 through Cash. A girl Cash had with him.</p> <p>16 Q. Okay. When -- when is the next -- was</p> <p>17 there another time that you were back at the United</p> <p>18 Inn & Suites?</p> <p>19 A. Yes, ma'am.</p> <p>20 Q. Okay. When was that?</p> <p>21 A. In January.</p> <p>22 Q. January of 2019?</p> <p>23 A. Correct.</p> <p>24 Q. All right. Okay. And how did you end up</p> <p>25 back at the United Inn?</p>	<p>1 So the first time you were at the United</p> <p>2 Inn in October and November --</p> <p>3 A. Yes, ma'am.</p> <p>4 Q. -- you were working for Cash and King; is</p> <p>5 that right?</p> <p>6 A. Yes, ma'am. Not at the same time,</p> <p>7 though, but in that span of time, yes, ma'am.</p> <p>8 Q. Right.</p> <p>9 Okay. So for part of the time, you were</p> <p>10 working for Cash; and then part of the time, you were</p> <p>11 working for King?</p> <p>12 A. Correct.</p> <p>13 Q. Okay. And then when you were back at the</p> <p>14 United Inn in January for a couple -- two to three</p> <p>15 days, you were working for King; is that right or?</p> <p>16 A. Correct.</p> <p>17 Q. Okay. And during that period of time,</p> <p>18 were you -- were you in the same room for those two</p> <p>19 to three days?</p> <p>20 A. Yes, ma'am.</p> <p>21 Q. Okay. Okay. And what happened that</p> <p>22 caused you to leave the hotel in January of 2019?</p> <p>23 A. (Witness unresponsive.)</p> <p>24 Q. Let me ask a different question.</p> <p>25 What happened that caused you to leave</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 38..41**

Page 38	Page 40
<p>1 the United Inn in January of 2019 after you had been</p> <p>2 there for two to three days? Why did you leave?</p> <p>3 A. I honestly don't even remember.</p> <p>4 Q. Okay.</p> <p>5 A. But I just know we all had left.</p> <p>6 Q. Okay. When you say "all" -- "we all had</p> <p>7 left," who are you talking about?</p> <p>8 A. I had first went to the United Inn with</p> <p>9 like three girls. We were, like, three other girls.</p> <p>10 The January time, not the first time, but the January</p> <p>11 time when I had went.</p> <p>12 Q. Okay. And what are their names?</p> <p>13 A. I actually don't remember. We were in</p> <p>14 group homes together, though.</p> <p>15 Q. Okay. So these three -- so these three</p> <p>16 girls that you went -- you're saying you went to the</p> <p>17 United Inn with them in the January time period;</p> <p>18 right?</p> <p>19 A. Correct.</p> <p>20 Q. And there are three girls you knew from</p> <p>21 group homes?</p> <p>22 A. Yeah. We -- we were in a group home</p> <p>23 together.</p> <p>24 Q. Okay. Tell me when you were in a -- tell</p> <p>25 me about the group home that you're talking about.</p>	<p>1 you left the United Inn in 20- -- January of 2019,</p> <p>2 and I think you said you didn't remember.</p> <p>3 A. Yeah, I don't recall.</p> <p>4 Q. Okay. Did you ever return to the United</p> <p>5 Inn?</p> <p>6 A. Again, after that?</p> <p>7 Q. Yes, ma'am.</p> <p>8 A. No, ma'am.</p> <p>9 Q. Okay. So there were just two -- two time</p> <p>10 periods you were at the United Inn, if I am --</p> <p>11 A. Correct.</p> <p>12 Q. Okay. One was in October or November of</p> <p>13 2018, and the other was in January of 2019?</p> <p>14 A. January; correct.</p> <p>15 Q. Okay.</p> <p>16 A. Could we take a break, though? Like, can</p> <p>17 I go to the restroom?</p> <p>18 MS. RICHENS: Absolutely.</p> <p>19 MR. BOUCHARD: Yes.</p> <p>20 MS. RICHENS: Absolutely. Take your</p> <p>21 microphone off so you don't pull it.</p> <p>22 THE VIDEOGRAPHER: Stand by.</p> <p>23 The time is 10:43 a.m. This is the</p> <p>24 end of Media No. 1, and we are off the</p> <p>25 record.</p>
Page 39	Page 41
<p>1 When were you in a group home?</p> <p>2 A. Like, from 2018 all the way to, like,</p> <p>3 20- -- from 2018 to 2020, I was in group homes.</p> <p>4 Q. How did you end up in a group home</p> <p>5 initially?</p> <p>6 A. Initially?</p> <p>7 Q. Yeah.</p> <p>8 A. My auntie wasn't fit to care for me at</p> <p>9 the time, and then I just had a child as well. It</p> <p>10 was just a lot going on at the time.</p> <p>11 Q. Okay. So when -- when would it have been</p> <p>12 that you first moved into a group home?</p> <p>13 A. I'm not sure, but sometime in 2018.</p> <p>14 Q. Okay. Was it before these incidents of</p> <p>15 sex trafficking that we're talking about?</p> <p>16 A. No. It was actually after the incident</p> <p>17 of sex trafficking, yeah.</p> <p>18 Q. Okay.</p> <p>19 A. Yeah.</p> <p>20 Q. So when you -- when you were first</p> <p>21 trafficked at Stone -- Stone Mountain Inn & Suites,</p> <p>22 you were still living with your -- your auntie?</p> <p>23 A. The very first time; correct.</p> <p>24 Q. Okay. All right. Okay. And so we</p> <p>25 were -- we were talking about where you went after</p>	<p>1 (Whereupon, the video camera was</p> <p>2 turned off.)</p> <p>3 (A short recess was taken.)</p> <p>4 (Whereupon, the video camera was</p> <p>5 turned on.)</p> <p>6 THE VIDEOGRAPHER: This is the</p> <p>7 beginning of Media No. 2. The time is</p> <p>8 10:55 a.m.</p> <p>9 We are on the record.</p> <p>10 BY MS. RICHENS:</p> <p>11 Q. All right. Ms. Grimes, so we took a</p> <p>12 little break, and we're -- we're back on the record</p> <p>13 now.</p> <p>14 So thank you for helping me walk through</p> <p>15 some of the chronology that we talked about before,</p> <p>16 and I'm -- as you might imagine, I'm really going to</p> <p>17 be focusing on the time at the United Inn since</p> <p>18 that's who I am representing.</p> <p>19 So you told me that you -- before you --</p> <p>20 before you wound up at the United Inn in October of</p> <p>21 2018, you had previously been at the Stone Mountain</p> <p>22 Inn; is that right?</p> <p>23 A. Correct.</p> <p>24 Q. Did you go directly from one to the</p> <p>25 other, or did you -- you know, go back to a group</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 42..45**

Page 42	Page 44
<p>1 home? Or what did -- how -- how did that work, if</p> <p>2 you know what I'm asking?</p> <p>3 A. No. I had went to -- I went to a CSEC</p> <p>4 home actually, and then I ended up going back, yeah,</p> <p>5 to -- well, not back, but to the United Inn</p> <p>6 afterwards.</p> <p>7 Q. Okay. And I didn't hear what you said.</p> <p>8 What kind of home?</p> <p>9 A. A CSEC home.</p> <p>10 Q. What is that?</p> <p>11 A. A house for like girls who are being</p> <p>12 sexually abused or sex trafficked or anything like</p> <p>13 that.</p> <p>14 THE VIDEOGRAPHER: Ms. Kerns, do you</p> <p>15 mind speaking up?</p> <p>16 I'm having a hard time hearing you.</p> <p>17 Sorry about that.</p> <p>18 THE WITNESS: I'm sorry. It's my</p> <p>19 throat.</p> <p>20 Can I -- can I get a cough drop?</p> <p>21 MR. BOUCHARD: Of course.</p> <p>22 THE WITNESS: Sorry.</p> <p>23 BY MS. RICHENS:</p> <p>24 Q. No, that's all right.</p> <p>25 So you were at a CSEC home, and you --</p>	<p>1 He picked you -- he picked you up and you think two</p> <p>2 other girls from the group home?</p> <p>3 A. Uh-huh.</p> <p>4 MR. BOUCHARD: What time frame are we</p> <p>5 talking about?</p> <p>6 BY MS. RICHENS:</p> <p>7 Q. We're talking October of 2018; is that</p> <p>8 right?</p> <p>9 We're --</p> <p>10 A. Correct.</p> <p>11 Q. And you -- you don't know the names of</p> <p>12 the other two girls?</p> <p>13 A. No. It, like, slipped my mind, but if I</p> <p>14 hear it, I will know that's their name.</p> <p>15 Q. Okay. All right. And -- and so</p> <p>16 Kimani -- Kimani took you and the other two girls to</p> <p>17 the United Inn?</p> <p>18 A. Correct.</p> <p>19 Q. Right.</p> <p>20 And -- and did you understand that you</p> <p>21 were going there to be -- to be trafficked?</p> <p>22 A. No. Hold on. I'm actually talking about</p> <p>23 January. I'm sorry.</p> <p>24 Q. Okay.</p> <p>25 A. That's really embarrassing.</p>
Page 43	Page 45
<p>1 did you run away from that home and end up at the --</p> <p>2 at the United Inn, or how did you get from that home</p> <p>3 to the United Inn?</p> <p>4 A. Someone had came and got us. Kimani,</p> <p>5 this boy, had came and picked us up, me and who I was</p> <p>6 with the -- some other girls at the time, and took us</p> <p>7 to United Inn.</p> <p>8 Q. Kimani picked up you and who else?</p> <p>9 A. Two other girls I was with.</p> <p>10 Q. And what are their names?</p> <p>11 A. Oh, no, actually --</p> <p>12 Q. I'm sorry. Go ahead. And take your</p> <p>13 time. I know -- I know we've been going back and</p> <p>14 forth a little bit on the time frames. So...</p> <p>15 I'm talking about in October of 2018.</p> <p>16 A. I can't think of the name, but I'm pretty</p> <p>17 sure it's in, like, a report too as well because I</p> <p>18 haven't talked to them since 2018.</p> <p>19 Q. Okay. So who is Kimahdi (PH)? Or</p> <p>20 Kimahdi or Kimani?</p> <p>21 A. Kimani. Kimani.</p> <p>22 He is a guy that I had met prior to me</p> <p>23 being in a group home. I had met him at the Stone</p> <p>24 Mountain Inn around that time.</p> <p>25 Q. Okay. So you ended up at the United Inn.</p>	<p>1 Q. No, no, no.</p> <p>2 A. No -- okay.</p> <p>3 So October of 2018; right?</p> <p>4 Q. Yes.</p> <p>5 A. No. A girl named Kevy had took me to the</p> <p>6 United Inn.</p> <p>7 Q. Okay. And we talked about --</p> <p>8 A. Yes, ma'am.</p> <p>9 Q. -- talked Kevy before. Okay. All right.</p> <p>10 So I'm going to cross out talking about Kimani.</p> <p>11 A. Yes, ma'am.</p> <p>12 Q. We'll get to him --</p> <p>13 A. It was a lot. This one -- but no,</p> <p>14 October, it was Kevy who had took me to --</p> <p>15 Q. Okay.</p> <p>16 A. -- United Inn the first time.</p> <p>17 Q. Okay. And I think what we said before</p> <p>18 was that Kevy picked you up.</p> <p>19 A. Uh-huh.</p> <p>20 Q. You thought you were going to the United</p> <p>21 Inn to work for Shaq; is that right?</p> <p>22 A. Correct, yes, ma'am.</p> <p>23 Q. Okay. So what happened when you -- you</p> <p>24 know, October 7th or 8th of 2018, what happened when</p> <p>25 you arrived at the United Inn?</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 46..49**

Page 46	Page 48
<p>1 A. Shaq, um, he already had gave like --</p> <p>2 Kevy already had money from Shaq. Like, he gave her</p> <p>3 the money to purchase the room, so she purchased the</p> <p>4 room, and then she ended up leaving to go do</p> <p>5 something, but she, like, never came back. I'm not</p> <p>6 sure what had happened, and I was still up there.</p> <p>7 Q. And when this first happened, do you know</p> <p>8 what room this was -- this was at the hotel?</p> <p>9 A. No. I just know it was a -- we were at</p> <p>10 the very top floor, and it was a back room.</p> <p>11 Q. Top floor back room, meaning the back of</p> <p>12 the hotel?</p> <p>13 A. Yes, ma'am.</p> <p>14 Q. Okay.</p> <p>15 A. On the backside.</p> <p>16 Q. Okay. Okay. And did you understand what</p> <p>17 you were doing there?</p> <p>18 A. At the time, no. But now, yes.</p> <p>19 Q. Okay. So -- so what happened? You --</p> <p>20 you got to this -- did someone bring you to the room?</p> <p>21 A. Yeah, Kevy did.</p> <p>22 Q. Okay. All right. And then what</p> <p>23 happened? You said she left.</p> <p>24 A. Yeah. So she had left, and then the next</p> <p>25 day, it was, you know, time to check out of the room.</p>	<p>1 and I know this is hard, and I -- I feel bad because</p> <p>2 I feel like I'm grilling you with questions. So</p> <p>3 please -- you know, I know it's difficult. So you</p> <p>4 take your time, and I will -- I will, you know, be</p> <p>5 professional, and we'll get through it.</p> <p>6 Okay?</p> <p>7 A. Right.</p> <p>8 Q. So what I'm hearing you say is you didn't</p> <p>9 know King; you didn't go to the hotel with King; you</p> <p>10 literally just met King at the hotel?</p> <p>11 A. Correct.</p> <p>12 Q. Okay. Do you want a tissue or something?</p> <p>13 A. Please.</p> <p>14 Q. Yeah.</p> <p>15 So you met King at the hotel, and you had</p> <p>16 this conversation, and then what -- and then what</p> <p>17 happened?</p> <p>18 A. He had took me in the room with him,</p> <p>19 like -- and then he had, like, two other girls with</p> <p>20 him too. One was, like, his baby mama, and the other</p> <p>21 was the baby mama's sister. But, yeah, like, he seen</p> <p>22 me at the hotel, you know, started asking me, like,</p> <p>23 what was I doing out there; did I need anything; I</p> <p>24 could come sit in his room and stuff like that. So</p> <p>25 then I went in the room and -- yeah.</p>
Page 47	Page 49
<p>1 So I'm just around the hotel, trying to get a ride,</p> <p>2 figure out, you know, what I'm about to do, and then</p> <p>3 I had met King.</p> <p>4 Q. I'm sorry. You were trying to get a --</p> <p>5 A. Get, like, a ride from the hotel or</p> <p>6 something.</p> <p>7 Q. Okay.</p> <p>8 A. Because I am just at the hotel.</p> <p>9 Q. Okay.</p> <p>10 A. Like, just outside at the hotel. So I</p> <p>11 ended up meeting King.</p> <p>12 Q. You just met him at the hotel?</p> <p>13 A. I mean, he -- yeah, like, he walked up to</p> <p>14 me. I am just outside so you know. I'm sorry. I</p> <p>15 don't mean to sound mean.</p> <p>16 But he -- I'm standing outside, yes, and</p> <p>17 he had approached me and told me I could come to his</p> <p>18 room, like asked me what I needed and stuff like</p> <p>19 that.</p> <p>20 Q. I'm sorry. You weren't mean -- did --</p> <p>21 you weren't mean to me.</p> <p>22 A. Yeah. I just didn't want to come across</p> <p>23 like that because that's not how I was trying to</p> <p>24 sound.</p> <p>25 Q. Well, and I -- I didn't take it that way,</p>	<p>1 Q. Where was this room? Where was King's</p> <p>2 room?</p> <p>3 A. I'm sorry. I'm sorry. I don't know why</p> <p>4 I'm crying right now.</p> <p>5 His room -- on the front side of the</p> <p>6 hotel, on the third floor. It was on the third floor</p> <p>7 in the front side. Like, in front of like the lobby</p> <p>8 area where you would walk into the lobby of the</p> <p>9 hotel.</p> <p>10 Q. Uh-huh.</p> <p>11 A. It was on that side.</p> <p>12 Q. Left side as you're looking at the hotel?</p> <p>13 A. Yes, ma'am.</p> <p>14 Q. Okay.</p> <p>15 A. It was on the left side.</p> <p>16 Q. Do you want to take a break, or you want</p> <p>17 to keep going?</p> <p>18 A. No. I really just want to get it over</p> <p>19 with.</p> <p>20 Q. Okay. I -- I thought you might say that</p> <p>21 so we'll -- we'll keep going. But if you -- if you</p> <p>22 ever do want to just stop, let me know.</p> <p>23 Okay. And so -- and then what happened?</p> <p>24 So you went -- you went -- you went into that room,</p> <p>25 and -- and what happened?</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 50..53**

Page 50	Page 52
<p>1 A. So he had took me into the room, and like</p> <p>2 we just started to -- like, he seemed as like, you</p> <p>3 know, like, he really cared about, like, what I had</p> <p>4 going on. And, you know, like, my safety at the</p> <p>5 time, like he was trying to protect me or whatever,</p> <p>6 and yeah. I'm sorry.</p> <p>7 Do you want me to go more into detail?</p> <p>8 Q. Well, so I guess at some point you --</p> <p>9 you -- he trafficked you?</p> <p>10 A. Yes, ma'am.</p> <p>11 Q. Did that just start like that day?</p> <p>12 A. No, it wasn't the same day, actually. It</p> <p>13 was, like, maybe, like, the following day. So the</p> <p>14 first day I met him --</p> <p>15 Q. Uh-huh.</p> <p>16 A. -- he didn't do that yet. Like, he was</p> <p>17 telling me about, like, what his baby mama and the</p> <p>18 sister were doing, like, and that is what they were</p> <p>19 doing, but at the time, it -- I wasn't doing that</p> <p>20 yet. Like, he was more so talking to me, I guess.</p> <p>21 Q. Okay.</p> <p>22 A. Yeah.</p> <p>23 Q. All right. And then it sounds like maybe</p> <p>24 the next day that -- that's what happened?</p> <p>25 A. So yes, that is what happened. Later</p>	<p>1 using it like that.</p> <p>2 Q. Okay. And what -- the time we're talking</p> <p>3 about now, and it sounds like it's early October, had</p> <p>4 you met Cash yet or this was just King?</p> <p>5 A. Not yet.</p> <p>6 Q. Okay. So -- so tell me about, um, maybe</p> <p>7 the first period of time when you -- when you were</p> <p>8 being trafficked by King at the United Inn, where --</p> <p>9 where was this -- where was the room, or were you</p> <p>10 moved from room to room?</p> <p>11 A. It just -- well, he had two rooms; so one</p> <p>12 was on the front side, and that was, like, the room</p> <p>13 we, like, slept in and stuff. We were living out of</p> <p>14 that room.</p> <p>15 Q. Okay.</p> <p>16 A. So everyone was living out of that one</p> <p>17 room, and then he had a room on the backside</p> <p>18 because -- it was three girls in the rooms, and all</p> <p>19 three of us couldn't make -- you know, money at the</p> <p>20 same time in one room. So he had another room. So</p> <p>21 one girl was doing what they were doing, and the girl</p> <p>22 goes to the other room.</p> <p>23 Q. Okay. So if I heard you correctly, he</p> <p>24 had two rooms; one was in the front where you would</p> <p>25 sleep at night?</p>
Page 51	Page 53
<p>1 that night, like, he had gave me, like, these pills</p> <p>2 or whatever, and then the next day, that's kind of</p> <p>3 when everything came into play. He had took me to</p> <p>4 another room that he had because he had another room</p> <p>5 on the backside of the hotel, but it was on the same</p> <p>6 floor, and then that's kind of what he like -- told</p> <p>7 me everything, like, what I was going to be doing and</p> <p>8 stuff.</p> <p>9 Q. He told you what you were going to be</p> <p>10 doing; is that what you said?</p> <p>11 A. Yes. Like, you know, "I have an ad.</p> <p>12 You're going to post an ad. You're going to make</p> <p>13 money, you're going to do this" and stuff like that.</p> <p>14 Q. Okay. All right. And that's what</p> <p>15 happened?</p> <p>16 A. (Witness indicating.)</p> <p>17 Q. Okay. And -- and where was -- do you</p> <p>18 know where the ads were posted?</p> <p>19 A. Uh-huh.</p> <p>20 Q. Where is that?</p> <p>21 A. On ListCrawler.</p> <p>22 Q. Okay. Were you familiar with</p> <p>23 ListCrawler? Had you heard of that before?</p> <p>24 A. Yes. I have -- I have heard of it</p> <p>25 before, yes, through Shaq. But I really wasn't like</p>	<p>1 A. I mean, they were working out of that</p> <p>2 room too.</p> <p>3 Q. Okay.</p> <p>4 A. But that is the room we were sleeping out</p> <p>5 of, though, yes.</p> <p>6 Q. Okay. And the other one was more</p> <p>7 where -- where the -- the sexual activity would</p> <p>8 occur?</p> <p>9 A. I mean, both of them --</p> <p>10 Q. Okay.</p> <p>11 A. -- it was occurring in, but one was just</p> <p>12 an extra room.</p> <p>13 Q. Okay.</p> <p>14 A. You -- if that makes sense because --</p> <p>15 Q. Yeah, I understand.</p> <p>16 A. Yes, ma'am.</p> <p>17 Q. I understand.</p> <p>18 And the two other girls are the two girls</p> <p>19 you told me about before, his baby mama and somebody</p> <p>20 else, or were there --</p> <p>21 A. Uh-huh.</p> <p>22 Q. Okay. And I may have asked you this</p> <p>23 before, but now that we're going through it a little</p> <p>24 bit more step-by-step, do you know whose -- whose</p> <p>25 name these rooms were rented in?</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 54..57**

Page 54	Page 56
<p>1 A. No. So I was staying -- when King --</p> <p>2 Q. Yes.</p> <p>3 A. He already, like, been up there, so the</p> <p>4 rooms that he had, he already had them. So I never,</p> <p>5 like, seen him rent a room because he already had the</p> <p>6 room. He never just not -- didn't have the room, if</p> <p>7 that makes sense. So he never had to go re-rent a</p> <p>8 room.</p> <p>9 And then with Cash, yes --</p> <p>10 Q. Can I have -- stop you there and we'll</p> <p>11 get to Cash --</p> <p>12 A. Uh-huh.</p> <p>13 Q. -- so I don't -- so we don't get</p> <p>14 confused.</p> <p>15 A. Okay.</p> <p>16 Q. Okay. All right. Okay.</p> <p>17 So how long were you -- how long were you</p> <p>18 being trafficked by King during this first period</p> <p>19 we're talking about?</p> <p>20 A. Maybe like a week and some days.</p> <p>21 Q. Okay. And can you tell me sort of what a</p> <p>22 day would look like? I mean, were you -- were you</p> <p>23 being trafficked all day long during that -- during</p> <p>24 that week?</p> <p>25 A. Yes.</p>	<p>1 12 plays a day.</p> <p>2 Q. Okay.</p> <p>3 A. I'm not sure, like, the exact number, but</p> <p>4 it's like around that.</p> <p>5 Q. Okay. No, that --</p> <p>6 A. It varied.</p> <p>7 Q. Yeah. That's why I'm trying to get just</p> <p>8 an idea.</p> <p>9 And were you -- when you were having --</p> <p>10 when you were having sex with these plays or having a</p> <p>11 play, or whatever you want to call it, were there</p> <p>12 other people in the room?</p> <p>13 A. No.</p> <p>14 Q. Okay.</p> <p>15 A. No. So if, like, the rooms are</p> <p>16 preoccupied or something, we'll use the car. Like,</p> <p>17 we'll have the play in the parking lot, and they will</p> <p>18 just park the car, like, on the backside or just</p> <p>19 somewhere where it's not a whole bunch of people</p> <p>20 walking by.</p> <p>21 Q. Did you do that?</p> <p>22 A. Did I do what?</p> <p>23 Q. Did you do a play in a -- in the parking</p> <p>24 lot sometimes?</p> <p>25 A. Yes, ma'am.</p>
Page 55	Page 57
<p>1 Q. Okay.</p> <p>2 A. (Witness unresponsive.)</p> <p>3 Q. Okay.</p> <p>4 A. I'm sorry. It was like -- so with King,</p> <p>5 it was, like, a 24/7 thing, like sun up to sun down.</p> <p>6 So he used to, like, give us pills and stuff so that</p> <p>7 we can stay up, like, you know, so we can keep</p> <p>8 working. But, like, we would work all day when it</p> <p>9 came to King. He would even sometimes, like, us take</p> <p>10 a nap or something, and he would get the phone and</p> <p>11 start like getting the plays to come in, like, just</p> <p>12 wake us up when, like, the plays are there and stuff</p> <p>13 like that, but we were always working.</p> <p>14 Q. Okay. Okay. And you answered a question</p> <p>15 I was going to have. I didn't know what we were</p> <p>16 going to call the -- the men that came -- that came</p> <p>17 to have sex with you, we're going to call them -- you</p> <p>18 would call them a "play"?</p> <p>19 A. Yes, ma'am.</p> <p>20 Q. All right.</p> <p>21 A. Yes.</p> <p>22 Q. So can you tell me, Ms. Grimes, how many</p> <p>23 plays you -- you were doing a day for King while you</p> <p>24 were working for him?</p> <p>25 A. Like a whole day. I have probably like</p>	<p>1 Q. Okay. What is your understanding -- we</p> <p>2 mentioned the ads.</p> <p>3 Is that your understanding of where these</p> <p>4 plays came from, that men would see your ad on</p> <p>5 ListCrawler and make arrangements that way? Or were</p> <p>6 there other -- other ways as well that you know of?</p> <p>7 A. It was through ListCrawler. Like, it</p> <p>8 would be, like, men -- we would make plays with men</p> <p>9 at the hotel. We would make -- we were on Memorial</p> <p>10 Drive, so there was a lot of traffic. Like, you</p> <p>11 could just stand outside, and cars would come</p> <p>12 through. So it was, like, three different ways.</p> <p>13 Q. Okay. So you talked about the ads, then</p> <p>14 you talked about just people at the hotel?</p> <p>15 A. (Witness indicating.)</p> <p>16 Q. Okay. And then you talked about traffic</p> <p>17 from Memorial Drive?</p> <p>18 A. (Witness indicating.)</p> <p>19 Q. Are those -- are those the three ways</p> <p>20 you're talking about?</p> <p>21 A. Yes, ma'am.</p> <p>22 Q. Okay. Okay. Did King have other people</p> <p>23 working with him, men or women helping him in any</p> <p>24 way, or was it just him?</p> <p>25 A. Like, did he have other girls working?</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 58..61**

Page 58	Page 60
<p>1 Q. That's not what I'm asking about.</p> <p>2 I'm asking about other -- like, other</p> <p>3 people helping him.</p> <p>4 A. Oh. If he did, I didn't know about them.</p> <p>5 Q. Okay. But let me confirm, and I think</p> <p>6 you did -- we have -- I think you have told me that</p> <p>7 at this time he did -- there were two other girls who</p> <p>8 were -- who were being trafficked as well by King; is</p> <p>9 that right?</p> <p>10 A. There were two girls in the room with me,</p> <p>11 yes, who were being trafficked by him, but he had</p> <p>12 other girls up there too working for him.</p> <p>13 Q. At this same time?</p> <p>14 A. Yes, ma'am. I actually met one of the</p> <p>15 girls too, but she wasn't staying in the room with</p> <p>16 us, though.</p> <p>17 Q. Okay. So you met two girls, but you say</p> <p>18 there were others he was trafficking as well and you</p> <p>19 met one of them?</p> <p>20 A. Uh-huh.</p> <p>21 Q. Okay. What was her name? Do you know?</p> <p>22 A. It was Promise.</p> <p>23 Q. Promise?</p> <p>24 A. Uh-huh.</p> <p>25 Q. Okay. So just to confirm, you said King</p>	<p>1 A. I tried to, like, keep some of the money,</p> <p>2 but he knew, so, like, it was like a big fight or</p> <p>3 whatever had happened. He had kicked me out of the</p> <p>4 room, so I am just like in the -- the little hallway</p> <p>5 of the hotel, like, where the front desk is and,</p> <p>6 like, the stairs and stuff.</p> <p>7 Q. Uh-huh.</p> <p>8 A. Like, the elevators and stuff. I am in</p> <p>9 that little hallway, and then I had ended up -- and</p> <p>10 it's nighttime too, and I had ended up meeting Cash</p> <p>11 and his girlfriend, or the girl he was with.</p> <p>12 Q. That's when you met Cash and his</p> <p>13 girlfriend?</p> <p>14 A. (Witness indicating.)</p> <p>15 Q. Okay. And so what happened there?</p> <p>16 A. They told me I could come in their room.</p> <p>17 They asked me what was going on. I told them what</p> <p>18 was going on, and they told me that I could come stay</p> <p>19 with them, like, in their room.</p> <p>20 Q. Okay. Is that what you did?</p> <p>21 A. (Witness indicating.)</p> <p>22 Q. All right. And then what happened after</p> <p>23 that?</p> <p>24 A. Like after --</p> <p>25 Q. So you went up to their room, you spent</p>
Page 59	Page 61
<p>1 sort of had all of the rooms. You didn't ever go,</p> <p>2 like, to the front desk with him to -- to pay for a</p> <p>3 room or anything like that; is that right?</p> <p>4 A. No. I was always, like, around the</p> <p>5 hotel, though.</p> <p>6 Q. Okay.</p> <p>7 A. But I never went to purchase the room,</p> <p>8 though, no.</p> <p>9 Q. Okay. And just so I am clear, do you</p> <p>10 know whose name his -- he rented -- the -- do you</p> <p>11 know whose name the rooms he rented or rented in?</p> <p>12 A. No, ma'am.</p> <p>13 Q. Okay. So did you get any money for</p> <p>14 plays? Were you given any money?</p> <p>15 A. No.</p> <p>16 Q. All the money went to King presumably?</p> <p>17 A. Yes.</p> <p>18 Q. So what happened next after that week or</p> <p>19 some -- week plus, you called it, that you were</p> <p>20 working for King?</p> <p>21 A. I had actually, like, tried to, like,</p> <p>22 take some money. So after, like, I had --</p> <p>23 Q. Take some money; is that what you --</p> <p>24 A. Yes.</p> <p>25 Q. Okay.</p>	<p>1 the night, I mean --</p> <p>2 A. So, like, the rest of the time period I</p> <p>3 was at the United Inn, it was with Cash and the other</p> <p>4 people that he was with.</p> <p>5 Q. Okay. And how long was that,</p> <p>6 approximately?</p> <p>7 A. Like, four weeks. So it was until, like,</p> <p>8 November. Like, the middle, end of November when he</p> <p>9 had got locked up. It was until he had got locked</p> <p>10 up.</p> <p>11 Q. Okay. And he was arrested at the United</p> <p>12 Inn?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. Did you ever go back to work for</p> <p>15 King, or that was the end of that?</p> <p>16 A. Not during this time period, no.</p> <p>17 Q. Okay. So in October, November, not -- no</p> <p>18 more with King. Okay.</p> <p>19 So tell me -- so then you were trafficked</p> <p>20 by Cash, it sounds like?</p> <p>21 A. Yes.</p> <p>22 Q. All right. And where in the hotel did</p> <p>23 this occur?</p> <p>24 A. So Cash had, like, multiple rooms. Like,</p> <p>25 King he had two rooms, and those were just his two</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 62..65**

Page 62	Page 64
<p>1 rooms. Cash is, like, we'll check in and check out, 2 like, we -- we were getting different rooms. Like, 3 if he didn't want a room, he will request a different 4 room. Like, we had different rooms. So I would say 5 about, like, four or five rooms in total within that 6 time frame. 7 Q. Okay. He would move around? 8 A. Uh-huh. 9 Q. And was it the -- kind of the same as 10 what you described with King in terms of men would 11 come, either from ListCrawler or they were just at 12 the hotel? Or -- or what -- what was -- was that the 13 same, or was that different? 14 A. It was kind of, like, the same, yeah. 15 But with Cash, it was, like, majority, like, most of 16 our plays came from, like, outside. Like, not on 17 ListCrawler. They came from, like, the hotel and 18 Memorial Drive and stuff like that. 19 Q. When you talk about coming from Memorial 20 Drive, did -- did you ever go out? Were you ever 21 asked to go out, or did you ever go out and walk 22 Memorial Drive? 23 A. Yeah. Cash used to make me and the other 24 girl do that, yeah. 25 Q. What -- let's see.</p>	<p>1 A. King again. 2 Q. How did you end up back at the United 3 Inn? 4 A. Kimani. A boy named Kimani. 5 Q. Okay. 6 A. Well, this man named Kimani brought me 7 there. 8 Q. Okay. We started talking about Kimani, 9 and then I think we realized we might be confused on 10 the time frame. 11 A. Uh-huh. 12 Q. So let me ask you, again, how did -- 13 who -- I think you said you met Kimani at the United 14 Inn -- excuse me, at the Stone Mountain Inn? 15 A. Yeah, that was my first time ever meeting 16 him, but we never, like, lost contact. Like, I was 17 still in contact. 18 Q. The first time you ever met him was at 19 the United -- excuse me, at the Stone Mountain Inn, 20 but -- 21 A. Yes. Like, in that time period, yes. 22 Q. Okay. 23 A. That was my first time meeting him. 24 Q. All right. And you were -- during this 25 stay in January of 2019, you were there for two or</p>
Page 63	Page 65
<p>1 What is the name of the other girl you're 2 talking about? 3 A. Her name is Mini. 4 Q. Mini? 5 A. Uh-huh. 6 Q. Okay. And so that -- that stay at the 7 hotel -- at the United Inn ended when Cash was 8 arrested? 9 A. (Witness indicating.) 10 Q. Okay. And did Cash have anyone helping 11 him? 12 A. Yeah. It was like Cash has, like, three 13 other men with him. 14 Q. Okay. Do you know their names? 15 A. No. But they're in the police report as 16 well. 17 Q. Okay. All right. Okay. 18 And then let's talk about, if we could, 19 the second -- or the next time you were at the United 20 Inn, which was in January of 2019. 21 A. Correct. 22 Q. And -- and you said that was, I think, 23 for two or three days is what you told me. 24 A. (Witness indicating.) 25 Q. And who was trafficking you then?</p>	<p>1 three days -- two to three days? 2 A. (Witness indicating.) 3 Q. And where -- where on the property were 4 you? Where at the United Inn? 5 A. We were actually, like, right by the 6 hallway. We were on the bottom floor so the main 7 level right in the front. Like, so if you look at 8 the lobby -- 9 Q. Uh-huh. 10 A. -- we were literally on the right, and we 11 were probably like two, three doors down from the 12 lobby. We were right there. 13 Q. Okay. And you were trafficked by King 14 during that time period? 15 A. (Witness indicating.) 16 Q. Okay. Do you know what the -- the dates 17 were of that? 18 A. No. I just know it was, like, early 19 January. 20 Q. Okay. And -- and what happened? Why did 21 you end up leaving the United Inn after that? 22 A. That's what I was -- I really don't even 23 recall why we had left, but we had left. I don't 24 remember why, though. 25 Q. Okay. And who is "we" that you're</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 70..73**

Page 70	Page 72
<p>1 it. One second.</p> <p>2 Keiron Perry?</p> <p>3 A. No, ma'am.</p> <p>4 Q. Quinton Antwan Bush?</p> <p>5 Endco Corey Forest?</p> <p>6 A. That's Cash.</p> <p>7 Q. Endco Corey Forest is Cash?</p> <p>8 A. Correct.</p> <p>9 Q. Okay. Thanks.</p> <p>10 Do you know who those other two gentlemen</p> <p>11 are?</p> <p>12 A. They were just in the room with us, like,</p> <p>13 the whole time period we were there. They were with</p> <p>14 Cash.</p> <p>15 Q. Were they arrested as well?</p> <p>16 A. Yes, ma'am.</p> <p>17 Q. Okay. Are you okay? Do you need a</p> <p>18 break?</p> <p>19 A. No, I'm good.</p> <p>20 Q. Are there any photos taken by you or</p> <p>21 anyone else at the United Inn?</p> <p>22 A. Yes, ma'am.</p> <p>23 Q. Okay. And did you provide those to your</p> <p>24 attorney?</p> <p>25 A. Yes, ma'am.</p>	<p>1 paperwork-wise that will say that.</p> <p>2 Q. Okay.</p> <p>3 A. I think it's, like, police reports too,</p> <p>4 but that's, like, it.</p> <p>5 Q. So you are saying that, if I am</p> <p>6 understanding you correctly, you received one of</p> <p>7 these trespass papers from the hotel; is that right?</p> <p>8 A. Yes, the day Cash had got locked up.</p> <p>9 Q. Okay. And does it have your name -- it</p> <p>10 has your name on it?</p> <p>11 A. No.</p> <p>12 Q. Whose --</p> <p>13 A. It has my cousin. I gave them another</p> <p>14 name.</p> <p>15 Q. Okay. What name did you give them?</p> <p>16 A. Shameka Grimes.</p> <p>17 Q. What's the first name?</p> <p>18 A. Shameka.</p> <p>19 Q. Spell it. Does it have a spelling, in</p> <p>20 your -- in your mind? How do you spell it?</p> <p>21 A. Ah --</p> <p>22 Q. Shameka?</p> <p>23 A. Yes, ma'am.</p> <p>24 Q. Okay. And you used your real last name,</p> <p>25 Grimes?</p>
Page 71	Page 73
<p>1 Q. Okay. Was it photos or video or both?</p> <p>2 A. Both.</p> <p>3 Q. Okay. All right. We'll come back to</p> <p>4 this.</p> <p>5 Do you have -- we talked about people you</p> <p>6 know who could -- who would -- who would confirm you</p> <p>7 were at the United Inn with you.</p> <p>8 Did you take anything from the United</p> <p>9 Inn, like a towel, a -- you know, an ashtray?</p> <p>10 Anything that you could say, "Look, this is from the</p> <p>11 United Inn"?</p> <p>12 A. No, ma'am. That was in 2018.</p> <p>13 Q. Okay. And I'm -- I understand.</p> <p>14 A. Yeah.</p> <p>15 Q. I'm just trying to ask questions.</p> <p>16 A. Yeah.</p> <p>17 Q. Do you have any paperwork that you --</p> <p>18 like, did you leave the United Inn with like a room</p> <p>19 receipt or a room key or an invoice or a bill,</p> <p>20 anything like that?</p> <p>21 A. No, I didn't, except for the paper that I</p> <p>22 signed when Cash had got arrested, and they, like,</p> <p>23 did the trespassing. You can't come back on the</p> <p>24 property basically because all of that had happened.</p> <p>25 That's the only, like, thing that I have</p>	<p>1 A. Yeah, because that's her real last name</p> <p>2 too.</p> <p>3 Q. Do you have a cousin named Shameka</p> <p>4 Grimes?</p> <p>5 A. Yes, ma'am, I do.</p> <p>6 Q. Okay. So you just gave them your</p> <p>7 cousin's name?</p> <p>8 A. Correct.</p> <p>9 Q. Okay. You mentioned that -- and I'm</p> <p>10 sorry, I can't remember who it was. So let me ask</p> <p>11 you -- I think it was King had given you drugs so you</p> <p>12 could stay awake?</p> <p>13 A. Uh-huh.</p> <p>14 Q. Do you know what kind of drugs you were</p> <p>15 given?</p> <p>16 A. No. I just know, like, they were, like,</p> <p>17 pills, and they just made you stay up. Like, you</p> <p>18 don't get tired on them.</p> <p>19 Q. Okay. Did Cash do that as well?</p> <p>20 A. He did actually as well, yeah.</p> <p>21 Q. Do you know --</p> <p>22 A. But his -- do I know what they're called?</p> <p>23 Q. Yeah.</p> <p>24 A. No. But it was -- whatever the pill was,</p> <p>25 it was the same thing.</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 74..77**

Page 74	Page 76
<p>1 Q. Okay.</p> <p>2 A. Like --</p> <p>3 Q. Did they have -- did they call them</p> <p>4 something? Like, do they have a nickname?</p> <p>5 A. It was, but I can't think of, like, the</p> <p>6 name that they used for them.</p> <p>7 Q. Okay.</p> <p>8 A. But it -- you know, like -- like, they</p> <p>9 will be, like, little pills, and, like, it will be</p> <p>10 in, like, a shape or something, and they come in,</p> <p>11 like, different colors.</p> <p>12 Q. Like, a gummy of some kind?</p> <p>13 A. No.</p> <p>14 Q. Or an actual pill?</p> <p>15 A. It was like an actual pill.</p> <p>16 Q. Okay. Okay. If you think of it, let me</p> <p>17 know.</p> <p>18 But it was the same for both King and</p> <p>19 Cash?</p> <p>20 A. Yes, ma'am.</p> <p>21 Q. Were they also selling drugs?</p> <p>22 A. Cash was; King wasn't.</p> <p>23 Q. Do you know what kind of drugs he was</p> <p>24 selling?</p> <p>25 A. Cash?</p>	<p>1 THE VIDEOGRAPHER: This is the</p> <p>2 beginning of Media No. 3 in the deposition</p> <p>3 of Jhordyn Grimes. The time is 11:51 a.m.,</p> <p>4 and we are on the record.</p> <p>5 BY MS. RICHENS:</p> <p>6 Q. All right. Ms. Grimes, I just have a</p> <p>7 couple of follow-up questions, and then we're going</p> <p>8 to move to another topic.</p> <p>9 So we have talked about Cash and his</p> <p>10 associates, the -- the men that were helping him and</p> <p>11 then King.</p> <p>12 Did any of those gentlemen carry weapons?</p> <p>13 Did they have guns?</p> <p>14 A. Every single one of them, yes.</p> <p>15 Q. All of them had guns?</p> <p>16 A. Yeah.</p> <p>17 Q. What did they -- I mean, did they ever</p> <p>18 threaten you with them, or what did they do with</p> <p>19 them?</p> <p>20 A. Not Cash, but the -- Cash never, like,</p> <p>21 threatened me, but him and, like, the other girl used</p> <p>22 to, like, actually, like -- like, he used to threaten</p> <p>23 her and beat her up and, like, stuff like that. But</p> <p>24 the other men who were in the room, they did. They</p> <p>25 have threatened me a couple of times, but...</p>
Page 75	Page 77
<p>1 Q. Yes.</p> <p>2 A. He was selling everything, like, ice.</p> <p>3 Q. What is ice?</p> <p>4 A. To be honest, I don't even know. I just</p> <p>5 know, like, that's what it was called.</p> <p>6 Q. It was called "ice." Okay.</p> <p>7 A. I know you can smoke it, though, because</p> <p>8 he smoked it before.</p> <p>9 Q. Okay.</p> <p>10 A. I want to say, like, crack -- whatever</p> <p>11 is, like, the hard rock (Witness indicating.) He</p> <p>12 sold that. The powder, coke, he sold that. He sold</p> <p>13 weed. He sold the same pills that he would give us.</p> <p>14 And I really think that's it.</p> <p>15 Q. Okay. All right.</p> <p>16 MS. RICHENS: Why don't we take a</p> <p>17 break, please.</p> <p>18 THE VIDEOGRAPHER: This is the end of</p> <p>19 Media No. 2. The time is 11:39 a.m., and</p> <p>20 we are off the record.</p> <p>21 (Whereupon, the video camera was</p> <p>22 turned off.)</p> <p>23 (A short recess was taken.)</p> <p>24 (Whereupon, the video camera was</p> <p>25 turned on.)</p>	<p>1 Q. The associates of Cash -- or is that who</p> <p>2 you're talking about?</p> <p>3 A. Yes, ma'am.</p> <p>4 Q. Okay. They -- they threatened you?</p> <p>5 A. Yes, ma'am.</p> <p>6 Q. What about King? Did he ever --</p> <p>7 A. Yes, ma'am. He was violent, yes, ma'am.</p> <p>8 Q. He was violent toward you?</p> <p>9 A. Yes, ma'am.</p> <p>10 Q. Did he hit you?</p> <p>11 A. Yeah. Yes, ma'am.</p> <p>12 Q. The other follow-up question is kind of</p> <p>13 general, and it may have been different depending on</p> <p>14 different times or different places, so just let me</p> <p>15 know.</p> <p>16 But I kind of want to know, like, when</p> <p>17 a -- let's say when -- when it was time for a play</p> <p>18 and you were in a room, I mean, how did that happen?</p> <p>19 Was there someone -- would they send the play to the</p> <p>20 room, or he would know where to come? Or can you</p> <p>21 kind of tell me how that would happen generally? Or</p> <p>22 if it was different -- different times, let me know</p> <p>23 that too.</p> <p>24 A. Could you just ask it one more time? I</p> <p>25 heard you, but just one more time.</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 78..81**

Page 78	Page 80
<p>1 Q. Yeah. Yes.</p> <p>2 So you are in a room expecting a play.</p> <p>3 A. (Witness indicating.)</p> <p>4 Q. How does the play get to the room, or how</p> <p>5 does he know where to come? How does he get into the</p> <p>6 room?</p> <p>7 A. Okay. So, like, it did depend, but,</p> <p>8 like, if it was -- when I was with King, like, when</p> <p>9 you post the ad or whatever, it will say where you</p> <p>10 are at, but it won't have, like, the room number and</p> <p>11 stuff. So once the play is getting ready to come,</p> <p>12 like, he will tell them, like, what room to come to,</p> <p>13 or if there's no rooms available, like, where to park</p> <p>14 at or just park, you know, where you feel comfortable</p> <p>15 because it depended on them too.</p> <p>16 And then, like, we'll meet them down in</p> <p>17 their car. It was really like that with Cash too,</p> <p>18 honestly. The play didn't get the room number until,</p> <p>19 like, they said they were at the United Inn or</p> <p>20 whatever, and then they would just post the room</p> <p>21 number.</p> <p>22 Q. So they would give the -- the play the</p> <p>23 room number. And how -- they would just come and</p> <p>24 knock on the door? The play would come and knock on</p> <p>25 the door, or how would they get in the room?</p>	<p>1 A. For King and Cash.</p> <p>2 Q. Okay.</p> <p>3 A. Yes, ma'am.</p> <p>4 Q. Thank you. I see now what you mean by</p> <p>5 fifty-fifty.</p> <p>6 A. Yes, ma'am.</p> <p>7 Q. Got it.</p> <p>8 And when you had a -- when you would have</p> <p>9 a play in a car, was there a -- like, a particular</p> <p>10 place on the property you would go, or did it depend?</p> <p>11 A. No, it wasn't actually. It really</p> <p>12 depended on where the play wanted to park. So where</p> <p>13 they felt like they would be comfortable out in the</p> <p>14 parking lot, so whether that would be like the front,</p> <p>15 wherever, by the lobby, like where they felt like,</p> <p>16 you know, nothing would happen to them or whatever</p> <p>17 the case may be. Like, whether it's the front or</p> <p>18 whether they felt safer in the back, it -- it really</p> <p>19 just depended on the play.</p> <p>20 Q. Okay. And how would that work? Would a</p> <p>21 play know it was going to be a -- a car play when</p> <p>22 they arrived?</p> <p>23 A. Sometimes, yes. Because when King used</p> <p>24 to post for us, like, he will, like, specify that,</p> <p>25 like, car play or, um -- I can't think of, like, the</p>
Page 79	Page 81
<p>1 A. Yeah, they would knock on the door.</p> <p>2 Q. Okay. How many times did you have a play</p> <p>3 in a -- in a car at the United Inn?</p> <p>4 A. It was like a fifty-fifty thing. Like,</p> <p>5 when there's no room, it's a car play. The United</p> <p>6 Inn, like, the way that it looked -- like even in the</p> <p>7 day, like, at day or night, like, you know, it looks</p> <p>8 unsafe. So some of the plays would come, and they</p> <p>9 wouldn't want to come into the room because of, like,</p> <p>10 the type of people that were around the hotel or,</p> <p>11 like, what was going on. So they would say, like,</p> <p>12 they would feel more comfortable if we came to the</p> <p>13 car, so we came to them. So it was like a</p> <p>14 fifty-fifty thing.</p> <p>15 Q. Okay. So let me -- let me ask again. If</p> <p>16 you know, I mean, was it five times? Ten times? I'm</p> <p>17 just trying to get a number if you know how many</p> <p>18 times you had a play in a -- in a car.</p> <p>19 A. So if I made 12 plays a day, I would say</p> <p>20 I had six plays in a car.</p> <p>21 Q. Okay.</p> <p>22 A. A day.</p> <p>23 Q. Okay. And that was consistent for all --</p> <p>24 A. Yes, ma'am.</p> <p>25 Q. -- the whole time?</p>	<p>1 other word, but, like, where they will come in.</p> <p>2 Q. Okay.</p> <p>3 A. So, like, sometimes, yeah, like, they</p> <p>4 knew beforehand it's going to be done in a car here,</p> <p>5 though. And then sometimes it wasn't supposed to</p> <p>6 have been the car play, but when they seen, like,</p> <p>7 the -- the hotel, that's what they requested. They</p> <p>8 didn't want to come in the room. They would rather</p> <p>9 do it in their car.</p> <p>10 Q. Okay. So you mentioned earlier this</p> <p>11 morning, I believe, Ms. Grimes, we were talking</p> <p>12 generally about walking around on the property.</p> <p>13 Okay?</p> <p>14 And so I want to ask you some questions</p> <p>15 about that.</p> <p>16 A. Uh-huh.</p> <p>17 Q. And we're -- again, of course, we're</p> <p>18 talking just about the United Inn.</p> <p>19 Okay?</p> <p>20 A. Yes, ma'am.</p> <p>21 Q. Okay. So am I correct that there were</p> <p>22 occasions you -- you had to walk around on the</p> <p>23 property?</p> <p>24 A. Yes, ma'am.</p> <p>25 Q. Okay. Can you tell me generally when</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 82..85**

Page 82	Page 84
<p>1 that would be or what -- for what purpose? Why were</p> <p>2 you walking around on the property?</p> <p>3 A. So when I was, like, walking around when</p> <p>4 I was with King, he didn't, like, make us walk the</p> <p>5 property to find plays. Like, majority of the time,</p> <p>6 he already had our plays for us, like, from the ads</p> <p>7 or something like that. But -- so when we would walk</p> <p>8 around, it would be to -- because --</p> <p>9 I don't know if you know this, but the</p> <p>10 hotel, like, they have, like, a store inside the</p> <p>11 hotel. So, like, we'll go down and buy stuff because</p> <p>12 they had like food, hygiene personal -- like, they</p> <p>13 had everything. So it would be to go to purchase,</p> <p>14 like, soap, condoms, noodles, whatever, like, gum,</p> <p>15 toothpaste, stuff like that. Say, we needed to</p> <p>16 switch our towels or something or the bedsheets but</p> <p>17 the housekeeper ladies are gone, we would have to go</p> <p>18 to the front -- so down to do that.</p> <p>19 And then when I was with Cash, it was</p> <p>20 the -- it was the same concept, but it was kind of</p> <p>21 different because Cash, like, had -- he, like, made</p> <p>22 us, like, walk around to find plays too. So at that</p> <p>23 point, like, we were still going to the office and</p> <p>24 stuff for what it was doing with King as well so,</p> <p>25 like, purchasing things and switching out, you know,</p>	<p>1 A. (Witness indicating.)</p> <p>2 Q. Okay. When you're -- when you're</p> <p>3 doing -- and I'm going to call it "strolling."</p> <p>4 Is that okay?</p> <p>5 A. (Witness indicating.)</p> <p>6 Q. So we know what we're talking about.</p> <p>7 When you're strolling, were you by</p> <p>8 yourself?</p> <p>9 A. No. It was -- Cash didn't, like, let us</p> <p>10 go outside by ourself, nor did King, honestly, but it</p> <p>11 would always be Mini and another man. So it would</p> <p>12 always be me and Mini and another one of Cash's</p> <p>13 associates, but it was never just, like, me or just</p> <p>14 her or like that.</p> <p>15 Q. There was always one of these men, who</p> <p>16 were Cash's associates, with you?</p> <p>17 A. (Witness indicating.)</p> <p>18 Q. And so what would you do? You would just</p> <p>19 walk -- you would look for people to -- to approach?</p> <p>20 A. Yeah, like, I mean, basically, yeah, just</p> <p>21 like provocative. Like, you're barely wearing</p> <p>22 clothes. You know, like, men are going to stop for</p> <p>23 that, like, you know, that was just that. Like, you</p> <p>24 really didn't even have to do nothing. You would</p> <p>25 just be there so they can see you, and they will come</p>
Page 83	Page 85
<p>1 towels and sheets, but we were actually, like,</p> <p>2 outside, like, strolling, I guess that's what they</p> <p>3 call it, walking around the property trying to, like,</p> <p>4 find plays and stuff, or, like, we walked up Memorial</p> <p>5 Drive a couple of times.</p> <p>6 Even with King, me and the baby mama, we</p> <p>7 walked across the gas -- to the gas station a couple</p> <p>8 of times to get stuff for all of us, but yeah.</p> <p>9 Q. So you used the term "strolling" to</p> <p>10 describe when you're walking around on the property</p> <p>11 to look for plays.</p> <p>12 A. I mean, no, that's not what I would call</p> <p>13 it, but I know that is what, like, they -- the term</p> <p>14 that people use.</p> <p>15 Q. The term people use.</p> <p>16 A. Yes, ma'am.</p> <p>17 Q. Okay. What -- tell me what that</p> <p>18 involves. Like, what -- what is somebody doing when</p> <p>19 they're doing that?</p> <p>20 A. You're just, like, walking around. Like,</p> <p>21 you barely have clothes on. You know, you look</p> <p>22 provocative, like, and you just walk around and get</p> <p>23 attention, and that's how that was.</p> <p>24 Q. And that's something you did when you</p> <p>25 were working for Cash?</p>	<p>1 like --</p> <p>2 Q. Okay. Was this during the day or at</p> <p>3 night or some of each?</p> <p>4 A. Some of each.</p> <p>5 Q. Okay. And the clothes that you're</p> <p>6 talking about, you said you barely had clothes on.</p> <p>7 Can you describe what you were wearing</p> <p>8 and also tell me were -- were these your clothes or</p> <p>9 the clothes that somebody provided to you?</p> <p>10 A. No, because when I had went to the United</p> <p>11 Inn, I only had, like, one outfit, and that's what I</p> <p>12 had on my body. So...</p> <p>13 Q. I'm sorry. You said when you went to the</p> <p>14 United Inn, you only had one outfit?</p> <p>15 A. Yes.</p> <p>16 Q. Okay.</p> <p>17 A. So -- and that's just, you know, like,</p> <p>18 what I had on when I had went. So the -- everything</p> <p>19 else that I had got, it was provided or it was, like,</p> <p>20 another girl's clothes who was there, like --</p> <p>21 Q. Okay. So what -- like, what kinds of</p> <p>22 clothes would that be when -- if you -- when you're</p> <p>23 strolling?</p> <p>24 A. It would be, like, off-the-shoulder tops,</p> <p>25 crop tops, tank tops, jumpsuits. Well, that's not</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 86..89**

Page 86	Page 88
<p>1 what you call it now. Like, two-piece sets.</p> <p>2 Q. Uh-huh.</p> <p>3 A. Like, leggings, just stuff like that.</p> <p>4 Like, we barely had clothes on, though.</p> <p>5 Q. Okay. How many times -- I'm sorry if I</p> <p>6 asked you this before, but I don't believe I did.</p> <p>7 How many times did you do this strolling</p> <p>8 with -- at the United Inn?</p> <p>9 A. Like, a day?</p> <p>10 Q. Did you do it every day?</p> <p>11 A. Yeah.</p> <p>12 Q. Okay.</p> <p>13 A. Honestly, when I was with Cash.</p> <p>14 Q. Cash? Okay.</p> <p>15 A. Yes, ma'am.</p> <p>16 Q. Okay. I want to ask you now about any</p> <p>17 interactions you had with people who worked at the</p> <p>18 United Inn.</p> <p>19 Okay?</p> <p>20 A. Uh-huh.</p> <p>21 Q. And I don't know if -- we need to break</p> <p>22 it up by -- by the two times that you were there, but</p> <p>23 let me just ask you generally -- or can you tell me</p> <p>24 generally what encounters you had with people who</p> <p>25 worked at the hotel?</p>	<p>1 the United Inn.</p> <p>2 A. So every day they have housekeeping.</p> <p>3 It's like that for any hotel, I believe. So every</p> <p>4 day a housekeeper do come to the room. Sometimes</p> <p>5 we'll allow them to clean the room, and then</p> <p>6 sometimes we'll clean the room ourselves.</p> <p>7 Q. Can I ask you a question about that?</p> <p>8 A. Uh-huh.</p> <p>9 Q. Is this like a -- you know, sometimes you</p> <p>10 go -- well, usually, I think when you go to a</p> <p>11 hotel --</p> <p>12 A. Uh-huh.</p> <p>13 Q. -- housekeeping just kind of goes around</p> <p>14 and knocks on the door.</p> <p>15 Is that what happened there?</p> <p>16 A. Yes, ma'am.</p> <p>17 Q. And so sometimes you would let them in</p> <p>18 and sometimes not?</p> <p>19 A. Yeah. Like, sometimes we'll just clean</p> <p>20 it ourselves, like...</p> <p>21 Q. What would happen when they knocked?</p> <p>22 A. We let them in.</p> <p>23 Q. Okay. But there was some times when they</p> <p>24 knocked and you just didn't let them in or?</p> <p>25 A. Uh-huh.</p>
Page 87	Page 89
<p>1 A. We had encounters -- well, I had</p> <p>2 encounters with housekeeping and then the front desk</p> <p>3 staff. They really didn't have, like, too many</p> <p>4 different types of staff. Those really were, like,</p> <p>5 the only two staff that they had. Like, the</p> <p>6 housekeeping and then the people who, I guess, own</p> <p>7 the hotel or work for the hotel.</p> <p>8 Q. You're saying that's pretty much all</p> <p>9 there was in terms of people who worked there.</p> <p>10 Is that -- is that what you meant?</p> <p>11 A. Uh-huh. Like, the housekeepers and then</p> <p>12 the people who worked in the front.</p> <p>13 Q. Okay.</p> <p>14 A. Like, so they didn't really have, like,</p> <p>15 maintenance and -- I guess that was housekeeping too.</p> <p>16 Q. Okay. All right.</p> <p>17 And you had some interactions with</p> <p>18 housekeeping, and you had some interactions with the</p> <p>19 front desk; is that right?</p> <p>20 A. Yes, ma'am.</p> <p>21 Q. Tell me, if you would -- we'll start with</p> <p>22 housekeeping.</p> <p>23 Describe for me the -- the types of -- I</p> <p>24 don't know how many you had, but how many -- the</p> <p>25 types of interactions you had with housekeeping at</p>	<p>1 Q. Okay.</p> <p>2 A. Like, we'll just do it ourselves.</p> <p>3 Q. Okay.</p> <p>4 A. But we still had to, like, get the</p> <p>5 supplies and stuff from them. But, like, we will</p> <p>6 tell them, like, "We can clean it ourselves. Like,</p> <p>7 you don't have to clean it. We can clean it." But</p> <p>8 we still used their supplies and stuff.</p> <p>9 Q. Would they -- so -- so if they came</p> <p>10 around, you would say, "We don't need you to come in,</p> <p>11 but can we have some towels?" or something -- is</p> <p>12 that what you're describing?</p> <p>13 A. No, not necessarily -- I mean, no, not</p> <p>14 really, like --</p> <p>15 Q. Okay.</p> <p>16 A. -- so they'll come knock on the door --</p> <p>17 Q. Uh-huh.</p> <p>18 A. And they -- let's just say, it's not that</p> <p>19 dirty or something. Like, if the room is dirty,</p> <p>20 housekeeping will clean the room. But if it's, like,</p> <p>21 not too much going on, like, it would be, like, we</p> <p>22 can -- we can clean the room. So they will let us</p> <p>23 get the spray bottle, like the broom or whatever and,</p> <p>24 like, rags to wipe down stuff.</p> <p>25 They would always come in to, like, bring</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 90..93**

Page 90	Page 92
<p>1 us new towels and sheets to, like, sit them in, like, 2 the restroom and stuff. They would always come in 3 and change our sheets. 4 But, like, just cleaning the room, like, 5 they didn't always do that for us, no. But we did 6 interact with housekeeping, like, every day. 7 Q. Okay. 8 A. Well, I did. I'm sorry. I keep saying 9 "we." I did. 10 Q. Okay. So what I hear you saying, and I 11 want to make sure that I'm correct, so you said you 12 interacted with housekeeping every day that they -- 13 that they regularly changed the sheets and towels, 14 but maybe -- may or may not have cleaned the room 15 other than that? 16 A. Hu-huh. Not every day, no. 17 Q. Okay. Did they come in and change the 18 sheets and towels or just kind of hand you sheets and 19 towels? 20 A. Hu-huh. They come in to do, like, that 21 part. 22 Q. Okay. And was it always the same 23 housekeeper, or were there different people at 24 different times? 25 A. No. It was different people.</p>	<p>1 Q. Okay. Did you ever tell them what you 2 were doing there? 3 A. No. 4 Q. Did you ever ask any of them for help? 5 A. No. 6 Q. Did they -- did any of them ever ask you 7 if you needed help? 8 A. No. 9 Q. Okay. And now let's talk, if -- if we 10 can, about -- I'm sorry. 11 Do you know the names of any of the 12 housekeeping staff that you interacted with? 13 A. Hu-huh. 14 Q. Were they men or women? 15 A. They were women. 16 Q. Okay. Do you know, were they black or 17 Indian or white or? 18 A. I honestly don't even remember. 19 Q. Okay. 20 A. I really want to say it was, like, a mix, 21 though. 22 Q. A mix of people? 23 A. Uh-huh. 24 Q. Okay. 25 A. None of them were white, though. I do</p>
Page 91	Page 93
<p>1 Q. Did you ever have any conversations with 2 these housekeeping people? 3 A. Yeah, like, they're actually pretty cool. 4 Not like that, but yes, like, we did talk. 5 Q. They were nice people? 6 A. Yes, ma'am. 7 Q. Okay. Like, what did you talk about? 8 A. It wasn't, like, conversations like that. 9 It would just be, like, about, like, cleaning the 10 room or something. Like, we need new towels. They 11 might -- like, I don't -- they used to try to be 12 funny. Like, we would be like, we need new towels or 13 something. Like, y'all just had new -- like, just 14 little stuff like that, but it was never, like, we 15 were, like, actually, like -- like, really 16 conversating about stuff. It was just, like, stuff 17 about the room and stuff like towels or sheets. 18 Q. So you had pleasant conversations with 19 them about the room or needing to be cleaned or 20 something, but -- but nothing other than that? 21 A. No. They really didn't -- really talk 22 about nothing for real. 23 Q. Okay. Did any -- anybody at housekeeping 24 ever ask you what you were doing there? 25 A. No.</p>	<p>1 remember that, but, like, a mix between, like, black 2 or Hispanic. 3 Q. Okay. Do you believe that when a 4 housekeeper came into the room at the United Inn, it 5 was obvious that the room was being used for sex 6 trafficking? 7 A. Yes, I do, actually. 8 Q. Okay. And tell me why. 9 A. Because it was, like, blatant. Like, the 10 way Cash and King kind of -- like, they were, like, 11 cool with everybody who worked up there. So it was, 12 like, nobody was scared when, like, the 13 housekeeper -- like, I feel like one maid -- when 14 housekeeping come, you may try to hide drugs. You 15 may try to hide guns. You may try to hide the 16 condoms. Like, you know, like, stuff like that, the 17 sheets, the towels. 18 Like, it wasn't like that, though. Like, 19 when housekeeping came, nothing changed. Like, how 20 the room was before, that's how the room still looked 21 when they entered the room. 22 So Cash sold drugs and stuff. 23 Housekeeping may come, it may be, like, drugs 24 scattered all on the desk or something because he's 25 getting ready to re-up or stuff like that. Condoms</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 94..97**

<p style="text-align: right;">Page 94</p> <p>1 in the trash. Like, I don't know. I feel like</p> <p>2 guns -- me personally, I just feel like it was kind</p> <p>3 of common sense, but, you know.</p> <p>4 Q. And I want to make sure I understand what</p> <p>5 you're describing.</p> <p>6 Are you saying that when housekeeping was</p> <p>7 coming, that Cash and King didn't -- didn't scurry</p> <p>8 around and hide things.</p> <p>9 Is that what you mean?</p> <p>10 A. Yeah. Like, what you probably would</p> <p>11 expect that they would be doing, like, that's not</p> <p>12 what happened. Like, they didn't bother to hide</p> <p>13 nothing. Like, they didn't care.</p> <p>14 Q. Did you ever see Cash or King or any of</p> <p>15 Cash's associates or anybody that we're talking about</p> <p>16 give any money to any of the housekeeping people?</p> <p>17 A. Not the housekeeping people, but a front</p> <p>18 lady -- a front desk lady. It was a black lady.</p> <p>19 Cash used to pay her, like, money or drugs because</p> <p>20 she used to buy drugs from him too.</p> <p>21 Q. Okay.</p> <p>22 A. Like, whichever one.</p> <p>23 Q. Okay. So I'm going to -- let me get</p> <p>24 to -- I will get to that. Thank you for flagging</p> <p>25 that.</p>	<p style="text-align: right;">Page 96</p> <p>1 purchase, like, condoms, toothbrush, toothpaste,</p> <p>2 tampons, Tylenol. They sold medicine and stuff too,</p> <p>3 Tylenol, like stuff like that.</p> <p>4 And then with Cash, it was we went to the</p> <p>5 front desk -- oh, same with King too -- like, to</p> <p>6 trade out towels and stuff, but that's only when,</p> <p>7 like, housekeeping was off duty at the time. So,</p> <p>8 like, say, they came around already and it's kind of</p> <p>9 later in the day now, so we'll have to go to the</p> <p>10 front to, like, trade out our towels and stuff or</p> <p>11 sheets and -- yeah.</p> <p>12 And then with Cash, it was the same</p> <p>13 thing, purchasing items from there, trading out our</p> <p>14 sheets and stuff. And then I actually, like, seen</p> <p>15 Cash, like, buy the rooms, so we used to, like, come</p> <p>16 with him to buy the room too. So we were up there</p> <p>17 when he did that.</p> <p>18 And that's all -- like, I didn't, you</p> <p>19 know, really go to the front desk for anything else.</p> <p>20 Q. How many times would you say -- did you</p> <p>21 go to the front desk every day?</p> <p>22 A. Yeah, this was, like, an everyday thing.</p> <p>23 Q. Okay. And would you go by yourself, or</p> <p>24 would you go with somebody?</p> <p>25 A. Sometimes, there was times I went by</p>
<p style="text-align: right;">Page 95</p> <p>1 A. Okay.</p> <p>2 Q. But no -- nobody in housekeeping, you</p> <p>3 never saw?</p> <p>4 A. Yeah, I've never seen him, like, pay</p> <p>5 housekeeping or nothing.</p> <p>6 Q. Okay. Did you ever hear Cash or his</p> <p>7 associates or King ever talk to anybody at</p> <p>8 housekeeping about what was going on in the rooms?</p> <p>9 A. No.</p> <p>10 Q. Okay. Now, I want to talk to you, if I</p> <p>11 may, about the front desk.</p> <p>12 A. Okay.</p> <p>13 Q. So -- so tell me -- you've talked about</p> <p>14 it a little bit, but kind of give me high level, if</p> <p>15 you would, why you would have occasion to go to</p> <p>16 that -- to that office up front. Is that what --</p> <p>17 when you say front desk, is that what you're talking</p> <p>18 about?</p> <p>19 A. Uh-huh.</p> <p>20 Q. Why would you be going to the front desk</p> <p>21 when you were at the United Inn?</p> <p>22 A. With King, if I was going to the front</p> <p>23 desk, it was to purchase, like, purchase things. So</p> <p>24 like I said, they sold, like, personal hygiene, food,</p> <p>25 like, everything you would need. So it would be to</p>	<p style="text-align: right;">Page 97</p> <p>1 myself. Like, to trade the towels or something, I</p> <p>2 went by myself. If I'm about to buy a condom or</p> <p>3 something, I went by myself. You know, like, just if</p> <p>4 I'm purchasing things from down there, like, things</p> <p>5 that we needed, I will go by myself.</p> <p>6 With -- with Cash, it was -- so that was</p> <p>7 with King, like if I needed to go get something, he</p> <p>8 would let me go by myself.</p> <p>9 With Cash, it wasn't -- it was always me</p> <p>10 and somebody else. So me and Mini; or me, Mini, and</p> <p>11 an associate. Like, I wasn't by myself with Cash.</p> <p>12 Q. Was it ever just you and Mini?</p> <p>13 A. Going to the front desk?</p> <p>14 Q. Yes.</p> <p>15 A. Yeah, like, to go -- because they got a</p> <p>16 vending machine right there too so, like, yeah, we'll</p> <p>17 go to the vending machine. It was right in front of</p> <p>18 the front desk. Yeah. I feel like we had to -- I</p> <p>19 don't know if that was me and Mini or that was just</p> <p>20 me. It was me and Mini. We had to go get a key</p> <p>21 recharged too, because back then, like, if you put</p> <p>22 your key by your phone, the key stopped working, so</p> <p>23 we had to go get keys recharged too a couple of times</p> <p>24 for the room.</p> <p>25 Q. Okay. Did you -- was it the same person</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 98..101**

Page 98	Page 100
<p>1 or people working at the front desk?</p> <p>2 A. Yes. So it was, like -- like, it was</p> <p>3 like a group of them.</p> <p>4 Q. Uh-huh.</p> <p>5 A. But, like, they would rotate out, though.</p> <p>6 So, like -- but it would always be, like, the same</p> <p>7 group of people, though.</p> <p>8 Q. Okay.</p> <p>9 A. But I guess it just depends on, like, the</p> <p>10 date or the time of, like, who was in the office, but</p> <p>11 it was always multiple of them in office too. It was</p> <p>12 never just one of them working and, like, you would</p> <p>13 go up to the office, there would be, like, three of</p> <p>14 them back there, but I guess they like, you know,</p> <p>15 rotate out.</p> <p>16 Q. Okay. When you went to the front desk</p> <p>17 for any of these reasons at the United Inn, did --</p> <p>18 did anyone ever ask you what you were doing at the</p> <p>19 hotel?</p> <p>20 A. No.</p> <p>21 Q. Okay. Did anyone -- did you ever tell</p> <p>22 anyone?</p> <p>23 A. No.</p> <p>24 Q. Did anyone ever ask you if you needed</p> <p>25 help?</p>	<p>1 would come to our room, like, and buy drugs from</p> <p>2 Cash.</p> <p>3 Q. Okay. Okay.</p> <p>4 So like I said, he -- she would give him</p> <p>5 money and he would give her drugs?</p> <p>6 A. Yes. I witnessed it --</p> <p>7 Q. Okay.</p> <p>8 -- it was an exchange.</p> <p>9 Q. Okay. Did you ever get to know her name?</p> <p>10 A. No. I just got, like, she was a</p> <p>11 skinny -- she was really skinny, an older black lady.</p> <p>12 She was older.</p> <p>13 Q. And you said you had seen -- she did work</p> <p>14 at the front desk?</p> <p>15 A. Yes, ma'am.</p> <p>16 Q. And -- what did I want to ask?</p> <p>17 Do you know what she was buying?</p> <p>18 A. So that's the thing, like, I don't know,</p> <p>19 like, the exact difference between, like, the --</p> <p>20 like, I know what type of drugs he had, like ice, the</p> <p>21 hard rock, and then, like, the soft powder, like,</p> <p>22 coke or whatever. But like, two of them looked</p> <p>23 similar, but they're like two different names. So,</p> <p>24 like, I don't know because they're both rocks. So I</p> <p>25 don't know if she was buying, like, ice or if she was</p>
Page 99	Page 101
<p>1 A. No.</p> <p>2 Q. Did you ever tell anyone you needed help?</p> <p>3 A. No.</p> <p>4 Q. Now, you mentioned a few minutes ago, and</p> <p>5 I told you we would come back to it, I think you said</p> <p>6 that there was a black woman who --</p> <p>7 A. Uh-huh. She used to buy drugs from Cash,</p> <p>8 or, like, Cash would pay her sometimes for the rooms.</p> <p>9 Q. What do you mean -- I'm sorry.</p> <p>10 So who -- there was a black woman at the</p> <p>11 front desk?</p> <p>12 A. Uh-huh.</p> <p>13 Q. Was -- was she working at the front desk?</p> <p>14 A. Yes, ma'am.</p> <p>15 Q. Okay. And she would buy drugs from Cash?</p> <p>16 A. Yeah, I seen her, like, come to the room</p> <p>17 a couple of times and buy drugs from Cash.</p> <p>18 Q. So what did you actually see taking place</p> <p>19 with her and him?</p> <p>20 A. What do you mean?</p> <p>21 Q. You said she bought drugs from Cash.</p> <p>22 A. Uh-huh.</p> <p>23 Q. So did you literally see him hand her</p> <p>24 drugs and she gave him cash?</p> <p>25 A. Yeah, like I would be in the -- like, she</p>	<p>1 buying crack.</p> <p>2 Q. Some kind of rock as opposed to some kind</p> <p>3 of pill --</p> <p>4 A. Yeah.</p> <p>5 Q. -- is that fair?</p> <p>6 A. Yes, ma'am.</p> <p>7 Q. Okay. Did anyone who worked at the hotel</p> <p>8 ever ask you how old you were?</p> <p>9 A. No.</p> <p>10 Q. Have you, in the last half hour or so as</p> <p>11 we have been talking, told me all of your</p> <p>12 interactions with people who worked at the -- who</p> <p>13 worked at United Inn & Suites?</p> <p>14 A. Yeah, like with housekeeping.</p> <p>15 Q. We talked about housekeeping, and then we</p> <p>16 talked about the front desk.</p> <p>17 A. Uh-huh.</p> <p>18 Q. Are there any --</p> <p>19 A. Because those were the only staff.</p> <p>20 Q. Okay. So we have covered everything?</p> <p>21 Your inter- -- your general inter- -- your</p> <p>22 interactions with people who worked at the hotel?</p> <p>23 A. I mean, I would interact with them every</p> <p>24 day, but it was, like, the same people, though, so --</p> <p>25 but we interacted every day. Like, the black lady,</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 102..105**

Page 102	Page 104
<p>1 she used to -- like, when Cash would go buy rooms or 2 something, say, they will say, like, a room is sold 3 out, because I told you he will, like, check in and 4 check back out.</p> <p>5 Q. Right.</p> <p>6 A. Like, he never -- never, like, had just a 7 set room how King had, like, a set room. So she 8 would be, like, sometimes you can't check in before a 9 certain time at a hotel, like you're just not 10 supposed to. Cash would pay her extra, and she would 11 give him the key to the room.</p> <p>12 What else? What else?</p> <p>13 Like, she used to -- we had, like, a room 14 on the end hall, but really, she did this with, like, 15 two of the rooms we had, though. Like, she will tell 16 us if we -- and she really worked night shift too. 17 That's really when she used to work, night shift.</p> <p>18 Q. Is this the -- the black lady that you're 19 talking about?</p> <p>20 A. But it -- yes, the black lady.</p> <p>21 Q. Okay.</p> <p>22 A. But it would like roll over to the day 23 sometimes too, but really worked night shift.</p> <p>24 So, like, she will tell us -- say, we're 25 having too much traffic coming in and out of the room</p>	<p>1 Q. Okay.</p> <p>2 A. It was always her telling Cash that 3 because he's the one who would be purchasing the 4 rooms.</p> <p>5 Q. And how do you know that she told Cash 6 that?</p> <p>7 A. I witnessed it --</p> <p>8 Q. Okay.</p> <p>9 A. -- a couple of times. She did it a 10 couple of times.</p> <p>11 Q. Okay. And so tell me, like, where that 12 happened. You know, like, you witnessed -- if I'm 13 hearing you correctly, you witnessed her telling Cash 14 there's too much traffic in there.</p> <p>15 A. So, like, she called the hotel phone a 16 couple of times. Like, our room -- you can call the 17 room from the lobby. She's called our room a couple 18 of times and told us like, "We're watching. You're 19 having too much traffic. Okay?"</p> <p>20 At one point she told him to, like, come 21 up to the front desk, but it was me, Mini and him. 22 She told him the same thing, "You're having too much 23 traffic." She suggested that he switch rooms.</p> <p>24 Like, those are the only two times I -- 25 I've, like, witnessed her do something like that, but</p>
Page 103	Page 105
<p>1 because Cash sold drugs and then what we were also 2 doing. So, like, she would warn him, you know, like, 3 "You" -- "you have too much traffic coming in and out 4 of your room. I suggest that" -- like, at one point, 5 she suggested that we switch rooms because we had a 6 room at end. Like, it was the end hall upstairs, and 7 she suggested that we switch rooms. So that's 8 exactly what we did; we switched rooms. Just, like, 9 stuff like that.</p> <p>10 Q. Did you hear that conversation yourself?</p> <p>11 A. Yes, ma'am. Like, she would call. Like, 12 it's too much traffic, like -- or, like, she would 13 tell him to, like, come to the front office. We 14 would go to the front office and say the same thing, 15 like, it's too much traffic. Like, we are -- we are 16 seeing all of these people, you know, like, coming 17 and out of the room, like, okay, stuff like that. So 18 we switched room.</p> <p>19 Q. So when she called, I mean, did you talk 20 to her yourself?</p> <p>21 A. No. Like, I never spoke to her about 22 stuff like that. I have spoke to her a couple times 23 just, like, regularly speaking, like -- but it was 24 never, like, her telling me, like, "Oh, yeah, y'all 25 have too much traffic." She never told me that.</p>	<p>1 she did that a couple of times, though.</p> <p>2 Q. Okay. So the time that you said she 3 called the room --</p> <p>4 A. Uh-huh.</p> <p>5 Q. -- you didn't talk to her?</p> <p>6 A. No. But you can hear her on the phone, 7 though. Yes, it's the room phone. You know, you put 8 the phone on speaker.</p> <p>9 Q. Okay.</p> <p>10 A. Yes, ma'am. So...</p> <p>11 Q. So you heard her on speaker. 12 And what did she say?</p> <p>13 A. Like, "We are watching you and there's 14 too much traffic. Like, we're watching that you're 15 having too much traffic. Basically, like, keep it 16 down. Okay?"</p> <p>17 The second time that she had called him 18 to the room -- I'm sorry, when she had called him to 19 the lobby or whatever, it was me and Mini who had 20 went with him. It was him too as well, though. So 21 it was the three of us who had went up there. And 22 then she told him the same thing like, you're -- 23 there's way too much traffic. And then this time, 24 she suggested that he switched rooms. So that's what 25 we did; we switched rooms.</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 106..109**

Page 106	Page 108
<p>1 And then --</p> <p>2 Q. Do you know why she was suggesting that?</p> <p>3 A. It was too much traffic.</p> <p>4 Q. Okay.</p> <p>5 A. She --</p> <p>6 Q. But what would switching rooms do? What</p> <p>7 would be the point switching rooms?</p> <p>8 A. I guess so it's not, like, so much</p> <p>9 traffic coming out of that one room. Like, so you</p> <p>10 switch rooms, I guess.</p> <p>11 Q. Just kind of mix it up a bit?</p> <p>12 A. Yeah, so it's not, like, just one room</p> <p>13 having so much traffic. It's multiple rooms having</p> <p>14 traffic, if that makes sense.</p> <p>15 Q. And was the traffic from selling drugs?</p> <p>16 A. No. It was from both.</p> <p>17 Q. From drugs and from traffic -- sex</p> <p>18 trafficking?</p> <p>19 A. Honestly, everybody had traffic coming in</p> <p>20 and out of their rooms at the United Inn, though.</p> <p>21 But, like, Cash, yeah, it was like -- it was bad,</p> <p>22 though, because not only was it, like, sexual; it's</p> <p>23 you're selling drugs as well. So it's, like, two</p> <p>24 different types of -- you know, like, it was just in</p> <p>25 and out, in and out, in and out, yeah.</p>	<p>1 supposed to?</p> <p>2 A. Yes. So money on top of what the room</p> <p>3 was.</p> <p>4 Q. I see.</p> <p>5 A. Yes.</p> <p>6 Q. I see.</p> <p>7 MS. RICHENS: Can we go off the</p> <p>8 record, please?</p> <p>9 THE VIDEOGRAPHER: The time is</p> <p>10 12:31 p.m., and we are off the record.</p> <p>11 (Whereupon, the video camera was</p> <p>12 turned off.)</p> <p>13 (A short recess was taken.)</p> <p>14 (Whereupon, the video camera was</p> <p>15 turned on.)</p> <p>16 THE VIDEOGRAPHER: This is the</p> <p>17 beginning of Media No. 4. The time is</p> <p>18 1:24 p.m., and we are on the record.</p> <p>19 BY MS. RICHENS:</p> <p>20 Q. Good afternoon, Ms. Grimes.</p> <p>21 A. Good afternoon.</p> <p>22 Q. A few follow-up questions on things we</p> <p>23 talked about this morning.</p> <p>24 We had some discussion about the</p> <p>25 occurrence when Cash was arrested at the United Inn</p>
Page 107	Page 109
<p>1 Q. Okay. Other than this lady that you're</p> <p>2 talking about, did you ever see any money exchange</p> <p>3 hands between, you know, your traffickers and their</p> <p>4 associates and anybody that worked at the hotel?</p> <p>5 A. Like, did I ever see them give money to</p> <p>6 the people at the hotel?</p> <p>7 Q. Correct.</p> <p>8 A. No. Unless they're, like, paying for a</p> <p>9 room, like, no.</p> <p>10 Q. Okay. And with respect to the lady we're</p> <p>11 talking about, the money you saw exchanging hands</p> <p>12 there was she was buying drugs? She was giving --</p> <p>13 she was giving Cash money and he -- he was giving her</p> <p>14 drugs?</p> <p>15 A. That, but then there was a time when we</p> <p>16 had went to the front office and he had gave her</p> <p>17 money because we weren't supposed to check in. So he</p> <p>18 used to, like, pay her to, like, you know, like,</p> <p>19 allow us to, like, do stuff. Like, so he gave her</p> <p>20 money because we were trying to check in, but they</p> <p>21 were telling us, like, no rooms were available. We</p> <p>22 cannot check in yet. He paid her, and she gave us</p> <p>23 the key to the room. So like that, like --</p> <p>24 Q. Okay. He paid her money so that she</p> <p>25 would give you the room key earlier than she was</p>	<p>1 in November.</p> <p>2 A. Yes, ma'am.</p> <p>3 Q. Other than that, were you ever present</p> <p>4 for any police activity at the United Inn?</p> <p>5 A. Yes. Well, not the police, but the</p> <p>6 ambulance had came out because Cash had, like, beat</p> <p>7 Mini up in the room, and she called the ambulance.</p> <p>8 So they came to, like, look at her, and I was with</p> <p>9 her because Cash had, like, left.</p> <p>10 Q. Okay.</p> <p>11 A. So it was me and her, and they looked at</p> <p>12 her or whatever, and then that was it. Like, they</p> <p>13 didn't transport her or nothing like -- but, like,</p> <p>14 other than that incident and then when he had got</p> <p>15 locked up, no.</p> <p>16 Q. Okay. Did you ever see any security</p> <p>17 guards at the United Inn?</p> <p>18 A. Yes. They did use to have a security</p> <p>19 guard, and he -- he had, like, a little car. Like,</p> <p>20 he would park his car somewhere and, like, watch from</p> <p>21 the parking lot. But I never seen, like, a security</p> <p>22 guard for patrolling the -- what am I trying to say?</p> <p>23 Like, actively, like, walking around.</p> <p>24 But they did have a security guard,</p> <p>25 though, because I remember seeing his car and he</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 110..113**

Page 110	Page 112
<p>1 would sit in the front sometimes, like, in the 2 parking lot.</p> <p>3 Q. Was it a marked car? Like, a police car 4 or a security car or just an unmarked car of some 5 kind?</p> <p>6 A. No. It was like a -- I guess, like, a 7 security car. It was a cop car.</p> <p>8 Q. Okay.</p> <p>9 A. But you could tell it was security, 10 though, if that makes sense.</p> <p>11 Q. Uh-huh.</p> <p>12 And sometimes parked in front?</p> <p>13 A. Uh-huh.</p> <p>14 Q. And was that there any particular time of 15 day or night? Did you ever notice?</p> <p>16 A. Usually, he was out there at nighttime. 17 That's really when we would see him, like nighttime.</p> <p>18 Q. Did you ever talk to this person?</p> <p>19 A. Hu-huh.</p> <p>20 Q. Did -- did you ever see a security guard 21 walking around the premises?</p> <p>22 A. No. See, now that's the part I'm saying, 23 like, I don't remember -- I don't remember ever 24 seeing, like, someone, like -- well, a security 25 guard, like, patrolling it, but they did have a</p>	<p>1 A. No.</p> <p>2 Q. Okay. You just were -- you were just 3 there doing what you were doing, and you weren't 4 either trying to tell somebody or hide it.</p> <p>5 Is that -- is that fair?</p> <p>6 A. Like, yeah. Like, at the time I wasn't, 7 like, thinking like that. Like, I didn't even know I 8 was, like, really being sex trafficked for real at 9 the time. Like, I didn't really notice what that was 10 but -- so, no. Like, I would go up there, like I 11 wasn't trying to hide it. Like, I would walk around 12 how I was walking around, like, because that's how 13 everybody was, like nobody was hiding nothing.</p> <p>14 Q. Okay.</p> <p>15 A. So I didn't think I had to either.</p> <p>16 Q. Say the last part again.</p> <p>17 A. I said nobody was hiding anything so I 18 didn't, like, think I had to either.</p> <p>19 Q. Got it.</p> <p>20 So based on that and based on what you 21 told us about your interactions with the folks that 22 were working at the front desk, do you think that 23 those people -- do you have any reason to believe 24 those people should have known that you were being 25 sex trafficked?</p>
Page 111	Page 113
<p>1 security guard.</p> <p>2 Q. Okay.</p> <p>3 A. Because we would see his car. Like, and 4 you know he was in the car because, like, a little 5 light would be on, but that was like it. I never, 6 like, seen him, you know.</p> <p>7 Q. Yes, I understand.</p> <p>8 A. Yeah.</p> <p>9 Q. Could you see was he -- if he was in 10 uniform of any kind?</p> <p>11 A. No.</p> <p>12 Q. Okay.</p> <p>13 A. No.</p> <p>14 Q. Did -- I may have asked you this. 15 Did you ever speak to the security guard?</p> <p>16 A. No, I didn't.</p> <p>17 Q. Okay. Before the lunch break, 18 Ms. Grimes, we were talking about visits that you 19 made to the front desk.</p> <p>20 A. Uh-huh.</p> <p>21 Q. When you did -- when you went to the 22 front desk, were you -- I don't know how I want to 23 ask this, but let me see how this works.</p> <p>24 Were you trying to hide the fact that you 25 were being sex trafficked?</p>	<p>1 A. Yes.</p> <p>2 Q. Okay. Tell me why.</p> <p>3 A. Just like the stuff that, like, went on 4 up there, it was, like, common sense. Me, I am 5 walking around --</p> <p>6 First of all, when I was out there, it 7 was cold as I don't know what's outside. Like, I'm 8 walking around with, like, no clothes on. I didn't 9 even own a jacket nor a coat. Like, it was, I had no 10 actual clothes to prepare for that season.</p> <p>11 Back then, I looked my age as well.</p> <p>12 Like, I was supposed to have been in school at that 13 time. I was not in school, but I was supposed to 14 have been. I'm up there for, like, weeks at a time 15 not going to school, like, sun up to sun down you see 16 me every day. Any time of the day you see me. Any 17 time, like, I leave out, it's a man following us.</p> <p>18 Like, it was kind of like -- anytime I left out, it 19 was with a man or Mini and another guy.</p> <p>20 When they will come, like, into the hotel 21 room -- well, housekeeping, when they'll like come to 22 the doors or, like, come in the room, like, like I 23 said, like, everything was out. So we'll have, like, 24 condoms in the trash. We are always switching 25 sheets. Like, I don't -- we're always switching</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 114..117**

Page 114	Page 116
<p>1 sheets. We're always needing new towels and rags</p> <p>2 more than, like, a regular person would.</p> <p>3 Like, you see, like, girls in a room with</p> <p>4 all these men, like, it's -- look at them, look at</p> <p>5 us. Like, that's really just how I feel they should</p> <p>6 know, like how we were walking around. The traffic</p> <p>7 that we had coming in and out, it was just a lot.</p> <p>8 Like, it was blatant, like, what was going on.</p> <p>9 But yeah, that's why I feel like they</p> <p>10 should have known or that they did know. We even --</p> <p>11 one of the workers were, like, telling us, like, when</p> <p>12 we had too much traffic, so, like, you know what's</p> <p>13 going on because you're telling us we're having too</p> <p>14 much traffic, like.</p> <p>15 Q. And that's the lady that we talked about</p> <p>16 before?</p> <p>17 A. Uh-huh. The black lady.</p> <p>18 Q. Okay.</p> <p>19 A. That's the one who, like, used to, like,</p> <p>20 tell us stuff like that.</p> <p>21 Q. How old was she? About how old would you</p> <p>22 say she was?</p> <p>23 A. She was like -- I don't know if she</p> <p>24 looked older or if she really was, like, older, but</p> <p>25 she was like a skinny black lady. I really want to</p>	<p>1 Q. Did you have a feeling for who managers</p> <p>2 were versus employees at -- at the hotel?</p> <p>3 A. Yeah.</p> <p>4 Q. Okay.</p> <p>5 A. I feel like -- from what I have seen,</p> <p>6 like, personally, I feel like because I always seen</p> <p>7 like the same group of people. So, like, I came to</p> <p>8 the conclusion, like, that is a family-owned hotel.</p> <p>9 Like, it's these same people.</p> <p>10 Q. Okay.</p> <p>11 A. You know, and then it's not -- it's not</p> <p>12 like a mix of, like, different races or whatever.</p> <p>13 Like, the only different race was that black lady</p> <p>14 that I seen and then, you know, like, the Hispanic</p> <p>15 housekeepers or whatever. But other than that, it</p> <p>16 was all, like, the same race working.</p> <p>17 And then the way that they even</p> <p>18 interacted with each other, it was like -- it was</p> <p>19 like given, like, y'all are husband or wife or, you</p> <p>20 know, like stuff like that. Like, that's how it came</p> <p>21 across, like, to me. So...</p> <p>22 Q. Were they always speaking in English with</p> <p>23 each other? Did they always speak English with each</p> <p>24 other?</p> <p>25 A. No. They -- they spoke another language</p>
Page 115	Page 117
<p>1 say, like, late 30s, early 40s, like, she was older.</p> <p>2 Q. That's older?</p> <p>3 A. No. I mean --</p> <p>4 Q. You're killing me here.</p> <p>5 A. No. But I was 16 at the time, so, you</p> <p>6 know, like, it was pretty old to me.</p> <p>7 Q. I'm teasing you. I hear you.</p> <p>8 I thought you meant, like, 70?</p> <p>9 A. No, no.</p> <p>10 Q. Okay. And do you know -- this lady that</p> <p>11 you're talking about --</p> <p>12 A. Uh-huh.</p> <p>13 Q. -- do you recall, was she there during</p> <p>14 the time that you were -- you were at United Inn in</p> <p>15 the fall the October/November?</p> <p>16 A. Uh-huh.</p> <p>17 Q. Was she still there in January? Do you</p> <p>18 know?</p> <p>19 A. I actually don't recall ever seeing her</p> <p>20 in January.</p> <p>21 Q. Okay. And so we've talked about that</p> <p>22 lady.</p> <p>23 Is there anyone else that -- well, let me</p> <p>24 ask you this question.</p> <p>25 A. Uh-huh.</p>	<p>1 too.</p> <p>2 Q. Okay.</p> <p>3 A. But when they speak to us, yeah, it's</p> <p>4 English.</p> <p>5 Q. All right.</p> <p>6 A. It was English.</p> <p>7 Q. Okay. So other than the -- the lady we</p> <p>8 have talked about now --</p> <p>9 A. Uh-huh.</p> <p>10 Q. -- the, quote, older lady, was there --</p> <p>11 did -- and you've told us the conversations that she</p> <p>12 had where she told you that you had too much traffic.</p> <p>13 Other than that, did you ever see or hear</p> <p>14 anything that lead you to believe that anybody else</p> <p>15 who worked at United Inn was -- was sort of in on it,</p> <p>16 like helping the traffic- -- helping the traffickers?</p> <p>17 A. Other than, like, just letting, like,</p> <p>18 what was going on, like, slide, like, no. Like, I</p> <p>19 never, like, verbally heard or seen them, like, do</p> <p>20 anything that would, like, help them out, I guess.</p> <p>21 But they, like, let it go on, so I feel like that was</p> <p>22 helping them out, like, but yeah.</p> <p>23 Q. Okay.</p> <p>24 A. I didn't, like -- yeah.</p> <p>25 Q. Okay. Do you know whether King or Cash</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 118..121**

Page 118	Page 120
<p>1 had trafficked women at United Inn previously?</p> <p>2 A. King did. But I only know this because,</p> <p>3 like, he -- like, he would say that. Like -- like,</p> <p>4 he would talk about it. That is how King made his</p> <p>5 money. Like, Cash would sell drugs and do that.</p> <p>6 King was more so, like, that is all he did,</p> <p>7 trafficked women. Like, he had multiple girls.</p> <p>8 Like, that was what he did.</p> <p>9 Like -- like, I told you one of the</p> <p>10 girls -- well, besides the two that I was actually in</p> <p>11 the room with, he had brought, like, another girl up</p> <p>12 there that worked for him and put her in the other</p> <p>13 room, and then he introduced me to her. That's the</p> <p>14 girl named Promise. So I had met her. That's the</p> <p>15 only other girl, like, I had, like, physically, like,</p> <p>16 actually met, except for the two that I was with that</p> <p>17 worked for him.</p> <p>18 But, like, he talked about them all the</p> <p>19 time. Like, he would call them too -- like, they</p> <p>20 would call him if, like, something was going wrong</p> <p>21 and stuff. Like, he was in the room with us, we'll,</p> <p>22 like, hear it. But he used to talk about that,</p> <p>23 though. Like, he was at the United Inn for a while</p> <p>24 even before I had met him, he was already there for a</p> <p>25 while.</p>	<p>1 actually doing at the Stone Mountain Inn in early</p> <p>2 2019?</p> <p>3 A. The same thing. We were being trafficked</p> <p>4 by Ronnie and Joc.</p> <p>5 Q. What's the other person's name? Joc?</p> <p>6 A. Uh-huh.</p> <p>7 Q. Okay. And were you being trafficked?</p> <p>8 A. Yes, ma'am.</p> <p>9 Q. Okay. And Chonty was as well?</p> <p>10 A. Yes, ma'am.</p> <p>11 Q. And is this what prompted the lawsuit</p> <p>12 that -- that you filed against Stone Mountain Inn?</p> <p>13 A. No, it's not, actually. I mean, it's</p> <p>14 part of it, yeah, but that's not, like, why I was --</p> <p>15 no.</p> <p>16 Q. But that's what the lawsuit was about?</p> <p>17 A. Sex trafficking?</p> <p>18 Q. Yes.</p> <p>19 A. Yes, ma'am.</p> <p>20 Q. Okay. And --</p> <p>21 A. Oh, wait. No, I misunderstood the</p> <p>22 question.</p> <p>23 Yes, that's exactly what the lawsuit was</p> <p>24 about, sex trafficking.</p> <p>25 Q. Okay. Okay. And Chonty filed a lawsuit</p>
Page 119	Page 121
<p>1 Q. So let me get back to that, how do you --</p> <p>2 how do you know that?</p> <p>3 A. Because that's what the baby mama and</p> <p>4 them said too. Like, he would say it, the baby mama</p> <p>5 said it, like, they were staying there for a minute.</p> <p>6 They were actually, like, living there.</p> <p>7 Q. Oh. He and his baby mama?</p> <p>8 A. And then a sister, yeah.</p> <p>9 Q. Okay.</p> <p>10 A. When I had met them.</p> <p>11 Q. Okay. Okay. So I understand,</p> <p>12 Ms. Grimes, just to move things along, that in early</p> <p>13 2019, you were arrested for trafficking Chonty Clarke</p> <p>14 at the Stone Mountain Inn; is that correct?</p> <p>15 A. Well, that's what they said at first to</p> <p>16 try to hold me because they couldn't, like, hold me</p> <p>17 for nothing unless they said something like that, so</p> <p>18 yes, ma'am, that's what they said at first.</p> <p>19 Q. Okay. So -- fair enough.</p> <p>20 So let me ask you, and that was --</p> <p>21 because I want to ask you what -- what happened.</p> <p>22 A. Uh-huh.</p> <p>23 Q. I think that was March of 2019.</p> <p>24 So what was -- what were you actually</p> <p>25 doing at the United Inn -- excuse me, what were you</p>	<p>1 against Stone Mountain Inn as well?</p> <p>2 A. As well, yes, ma'am.</p> <p>3 Q. Okay. Did you ever traffic Chonty</p> <p>4 Clarke?</p> <p>5 A. No, I didn't.</p> <p>6 Q. And let me make sure I'm -- we haven't</p> <p>7 really identified the term. But -- so --</p> <p>8 Did you ever make her available for sex</p> <p>9 for money?</p> <p>10 A. No, I didn't.</p> <p>11 Q. Okay. Did you -- have you ever done that</p> <p>12 with any -- any girl or women or boy?</p> <p>13 A. No, I haven't.</p> <p>14 Q. Okay.</p> <p>15 A. No.</p> <p>16 Q. And what you said before is you believe</p> <p>17 that -- tell me again why you think that accusation</p> <p>18 was made against you.</p> <p>19 A. No. I know that's why it made against</p> <p>20 me. It was actually said, like, they couldn't hold</p> <p>21 me so they had to put something against me, but if</p> <p>22 you like -- I don't know if you know, but it's, like,</p> <p>23 court documents, they actually ended up dropping</p> <p>24 every single charge against me, and Joc and Ronnie</p> <p>25 both ended up getting charged. I was labelled a</p>